

CONTAINS NO CBI



Form Approved  
OMB No. 2010-0019  
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EPA-OTS



000611698V

90-890000623

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Comprehensive Assessment Information Rule  
REPORTING FORM

8 SEP 6 PM 5:14  
EPA-OTS  
115 W 9-1318

When completed, send this form to:

Document Processing Center  
Office of Toxic Substances, TS-790  
U.S. Environmental Protection Agency  
401 M Street, SW  
Washington, DC 20460  
Attention: CAIR Reporting Office

For Agency Use Only:

Date of Receipt: \_\_\_\_\_

Document  
Control Number: \_\_\_\_\_

Docket Number: \_\_\_\_\_

SECTION 1 GENERAL MANUFACTURER, IMPORTER, AND PROCESSOR INFORMATION

PART A GENERAL REPORTING INFORMATION

1.01 This Comprehensive Assessment Information Rule (CAIR) Reporting Form has been completed in response to the Federal Register Notice of..... [1][2] [2][2] [8][8]  
CBI mo. day year

- ☐ a. If a Chemical Abstracts Service Number (CAS No.) is provided in the Federal Register, list the CAS No. .... [0][0][0][3][8][4]-[8][4]-[9]
- b. If a chemical substance CAS No. is not provided in the Federal Register, list either (i) the chemical name, (ii) the mixture name, or (iii) the trade name of the chemical substance as provided in the Federal Register.
- (i) Chemical name as listed in the rule ..... NA
- (ii) Name of mixture as listed in the rule .... NA
- (iii) Trade name as listed in the rule ..... NA
- c. If a chemical category is provided in the Federal Register, report the name of the category as listed in the rule, the chemical substance CAS No. you are reporting on which falls under the listed category, and the chemical name of the substance you are reporting on which falls under the listed category.
- Name of category as listed in the rule ..... NA
- CAS No. of chemical substance ..... [ ][ ][ ][ ][ ][ ]-[ ][ ]-[ ]
- Name of chemical substance ..... NA

1.02 Identify your reporting status under CAIR by circling the appropriate response(s).

- CBI Manufacturer ..... 1
- ☐ Importer ..... 2
- Processor ..... (3)
- X/P manufacturer reporting for customer who is a processor ..... 4
- X/P processor reporting for customer who is a processor ..... 5

☐ Mark (X) this box if you attach a continuation sheet.

1.03 Does the substance you are reporting on have an "x/p" designation associated with it in the above-listed Federal Register Notice?

CBI

☐ Yes ..... ☒ Go to question 1.04

☐ No ..... ☐ Go to question 1.05

1.04 a. Do you manufacture, import, or process the listed substance and distribute it under a trade name(s) different than that listed in the Federal Register Notice? Circle the appropriate response.

CBI

☐ Yes ..... 1

☐ No ..... 2

b. Check the appropriate box below:

☐ You have chosen to notify your customers of their reporting obligations

Provide the trade name(s) ....

☐ You have chosen to report for your customers

☐ You have submitted the trade name(s) to EPA one day after the effective date of the rule in the Federal Register Notice under which you are reporting.

1.05 If you buy a trade name product and are reporting because you were notified of your reporting requirements by your trade name supplier, provide that trade name.

CBI

☐ Trade name ..... Conathane EN-11 Part A

Is the trade name product a mixture? Circle the appropriate response.

☒ Yes ..... 1

No ..... 2

1.06 Certification -- The person who is responsible for the completion of this form must sign the certification statement below:

CBI

☐ "I hereby certify that, to the best of my knowledge and belief, all information entered on this form is complete and accurate."

Thomas X. Tsirimokos  
NAME

Thomas X. Tsirimokos  
SIGNATURE

8/31/89  
DATE SIGNED

Senior Staff Attorney  
TITLE

( 603 ) 885-4556  
TELEPHONE NO.

☐ Mark (X) this box if you attach a continuation sheet.

- 1.07 Exemptions From Reporting -- If you have provided EPA or another Federal agency with the required information on a CAIR Reporting Form for the listed substance within the past 3 years, and this information is current, accurate, and complete for the time period specified in the rule, then sign the certification below. You CBI ☐ are required to complete section 1 of this CAIR form and provide any information now required but not previously submitted. Provide a copy of any previous submissions along with your Section 1 submission.

"I hereby certify that, to the best of my knowledge and belief, all required information which I have not included in this CAIR Reporting Form has been submitted to EPA within the past 3 years and is current, accurate, and complete for the time period specified in the rule."

Not Applicable \_\_\_\_\_  
NAME SIGNATURE DATE SIGNED  
\_\_\_\_\_  
TITLE ( ) TELEPHONE NO. DATE OF PREVIOUS SUBMISSION

- 1.08 CBI Certification -- If you have asserted any CBI claims in this report you must certify that the following statements truthfully and accurately apply to all of those confidentiality claims which you have asserted.

CBI ☐ "My company has taken measures to protect the confidentiality of the information, and it will continue to take these measures; the information is not, and has not been, reasonably ascertainable by other persons (other than government bodies) by using legitimate means (other than discovery based on a showing of special need in a judicial or quasi-judicial proceeding) without my company's consent; the information is not publicly available elsewhere; and disclosure of the information would cause substantial harm to my company's competitive position."

Not Applicable \_\_\_\_\_  
NAME SIGNATURE DATE SIGNED  
\_\_\_\_\_  
TITLE ( ) TELEPHONE NO.

☐ Mark (X) this box if you attach a continuation sheet.

### 1.09 Facility Identification

Dun & Bradstreet Number .....[0][0]-[8][2][4]-[2][0][6][7]  
EPA ID Number .....[9][8][0][6][6][8][8][7][5]  
Employer ID Number .....[2][0][2][3][0][8][7][2]  
Primary Standard Industrial Classification (SIC) Code .....[3][6][9][9]  
Other SIC Code .....[3][6][7][2]  
Other SIC Code .....[ ][ ][ ][ ]

Dun & Bradstreet Number .....[0][0]-[8][2][4]-[2][0][6][7]  
Employer ID Number .....[2][0][2][3][0][8][7][2]

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Con ENII Analytix

### 1.11 Parent Company Identification

CBI Name [Z][O][C][K][H][E][E][D][ ][C][O][R][P][O][R][A][T][I][O][N][ ][ ][ ][ ][ ][ ]

[ ] Address [4][5][0][0][ ] [P][A][R][K][ ] [G][R][A][M][A][N][A][ ] [S][T][R][E][E][T][ ] [A][L][Y][D][ ] [ ] [ ]

[C][A][L][I][F][O][R][N][I][A] City

State Zip

Dun &amp; Bradstreet Number .....[0][0]-[8][2][5]-[5][2][8][3]

## 1.12 Technical Contact

CBI Name [J][A][M][E][S][ ][A][ ][K][O][H][L][E][R][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ]

( ) Title MORFONVIRONMENTAL AFFAIRS

Address [9][5]-[C][A][N][A][L]-[S][T][R][E][E][T]-[-][-][-][-][-][-][-][-] Street

City

[N][H] [0][3][0][6][1]--[2][0][0][4]  
State Zip

Telephone Number .....[6][0][3]-[8][8][5]-[3][8][7][8]

1.13 This reporting year is from ..... [0] [1] [8] [8] to [1] [2] [8] [8]  
Mo. Year Mo. Year

☐ Mark (X) this box if you attach a continuation sheet.

1.14 Facility Acquired -- If you purchased this facility during the reporting year, provide the following information about the seller: *Not Applicable*

Not Applicable

[illegible][illegible]

Street

[ ] [ ] [ ] [ ] [ ] [ ] [ ] [ ] [ ] [ ] [ ] [ ] [ ] [ ] [ ] [ ]

Čítv

[ ] [ ]      [ ] [ ] [ ] [ ] [ ] [ ] -- [ ] [ ] [ ] [ ]

State

Zip

[illegible]

Date of Sale .....[ ] [ ] [ ] [ ] [ ] [ ]

Mo.

Day

Year

[illegible]

Telephone Number .....[ ][ ]-[ ][ ]-[ ][ ]

1.15 Facility Sold -- If you sold this facility during the reporting year, provide the following information about the buyer: *Not Applicable*

Not Applicable

[illegible][illegible]

Street

[ ] [ ] [ ] [ ] [ ] [ ] [ ] [ ] [ ] [ ] [ ] [ ] [ ] [ ] [ ] [ ] [ ] [ ]

City

[ ] [ ]      [ ] [ ] [ ] [ ] [ ] -- [ ] [ ] [ ] [ ]

State

Zip

[illegible]

Date of Purchase .....[ ][ ] [ ][ ] [ ][ ]

Mo.

Da v

Year

[illegible]

Telephone Number .....[ ][ ]-[ ][ ]-[ ][ ]

☐ Mark (X) this box if you attach a continuation sheet.

1.16 For each classification listed below, state the quantity of the listed substance that was manufactured, imported, or processed at your facility during the reporting year.

CBI

Classification

Quantity (kg/yr)

☐

Manufactured ..... Not App.  
Imported ..... Not App.  
Processed (include quantity repackaged) ..... 1.4 Kg.

Of that quantity manufactured or imported, report that quantity:

In storage at the beginning of the reporting year ..... Not App.  
For on-site use or processing ..... Not App.  
For direct commercial distribution (including export) ..... Not App.  
In storage at the end of the reporting year ..... Not App.

Of that quantity processed, report that quantity:

In storage at the beginning of the reporting year ..... NA  
Processed as a reactant (chemical producer) ..... 0.0  
Processed as a formulation component (mixture producer) ..... 0.0  
Processed as an article component (article producer) ..... NA  
Repackaged (including export) ..... 0.0  
In storage at the end of the reporting year ..... NA

☐ Mark (X) this box if you attach a continuation sheet.



1.17 Mixture -- If the listed substance on which you are required to report is a mixture or a component of a mixture, provide the following information for each component chemical. (If the mixture composition is variable, report an average percentage of each component chemical for all formulations.)

[ ]

| Component Name           | Supplier Name | Average % Composition by Weight<br>(specify precision,<br>e.g., 45% ± 0.5%) |
|--------------------------|---------------|---|
| Toluene 2,4 Diisocyanate | Congaf, Inc.  | < 15% ± NA  |
|                          |               |   |
|                          |               |   |
|                          |               |   |
|                          |               |   |
|                          |               |   |
| Total                    |               | 100%  |

10

- 2.04 State the quantity of the listed substance that your facility manufactured, imported, or processed during the 3 corporate fiscal years preceding the reporting year in descending order.

CBI

☐ Year ending ..... [1][2] [8][7]  
Mo. Year

Quantity manufactured ..... Not App. kg

Quantity imported ..... Not App. kg

Quantity processed ..... 1 kg

Year ending ..... [0][7] [8][6]  
Mo. Year

Quantity manufactured ..... Not App. kg

Quantity imported ..... Not App. kg

Quantity processed ..... 0 kg

Year ending ..... [0][7] [8][5]  
Mo. Year

Quantity manufactured ..... Not App. kg

Quantity imported ..... Not App. kg

Quantity processed ..... 0 kg

- 2.05 Specify the manner in which you manufactured the listed substance. Circle all appropriate process types.

CBI

☐ Continuous process ..... Not Applicable 1

Semicontinuous process ..... 2

Batch process ..... 3

☐ Mark (X) this box if you attach a continuation sheet.

2.06 Specify the manner in which you processed the listed substance. Circle all appropriate process types.

☐

Continuous process .....

Semicontinuous process .....

Batch process ..... (3)

2.07 State your facility's name-plate capacity for manufacturing or processing the listed substance. (If you are a batch manufacturer or batch processor, do not answer this question.)

CBI

☐

Manufacturing capacity ..... kg/yr

Processing capacity ..... kg/yr

2.08 If you intend to increase or decrease the quantity of the listed substance manufactured, imported, or processed at any time after your current corporate fiscal year, estimate the increase or decrease based upon the reporting year's production volume.

CBI

☐

|                    | Manufacturing<br>Quantity (kg) | Importing<br>Quantity (kg) | Processing<br>Quantity (kg) |
|--------------------|--------------------------------|----------------------------|-----------------------------|
| Amount of increase | <u>Not Applicable</u>          | <u>Not Applicable</u>      | <u>UK</u>                   |
| Amount of decrease | <u>Not Applicable</u>          | <u>Not Applicable</u>      | <u>UK</u>                   |

☐ Mark (X) this box if you attach a continuation sheet.

2.09 For the three largest volume manufacturing or processing process types involving the listed substance, specify the number of days you manufactured or processed the listed substance during the reporting year. Also specify the average number of hours per day each process type was operated. (If only one or two operations are involved, list those.)

CBI

☐

Days/Year      Average  
Hours/Day

Process Type #1 (The process type involving the largest quantity of the listed substance.)

Manufactured ..... Not Applicable

Processed ..... 1      1

Process Type #2 (The process type involving the 2nd largest quantity of the listed substance.)

Not Applicable

Manufactured ..... \_\_\_\_\_

Processed ..... \_\_\_\_\_

Process Type #3 (The process type involving the 3rd largest quantity of the listed substance.)

Not Applicable

Manufactured ..... \_\_\_\_\_

Processed ..... \_\_\_\_\_

2.10 State the maximum daily inventory and average monthly inventory of the listed substance that was stored on-site during the reporting year in the form of a bulk chemical.

CBI

☐

Maximum daily inventory ..... Response not required for TDI. kg

Average monthly inventory ..... \_\_\_\_\_ kg

☐ Mark (X) this box if you attach a continuation sheet.

2.11 Related Product Types -- List any byproducts, coproducts, or impurities present with the listed substance in concentrations greater than 0.1 percent as it is manufactured, imported, or processed. The source of byproducts, coproducts, or impurities means the source from which the byproducts, coproducts, or impurities are made or introduced into the product (e.g., carryover from raw material, reaction product, etc.).

CBI

☐

| <u>CAS No.</u> | <u>Chemical Name</u> | <u>Byproduct, Coproduct or Impurity<sup>1</sup></u> | <u>Concentration (%) (specify <math>\pm</math> % precision)</u> | <u>Source of Byproducts, Coproducts, or Impurities</u> |
|----------------|----------------------|---|---|--|
| <u>UK</u>      | <u>UK</u>            | <u>UK</u>   | <u>UK</u>   | <u>UK</u>  |
| <u> </u>       | <u> </u>             | <u> </u>  | <u> </u>  | <u> </u>   |
| <u> </u>       | <u> </u>             | <u> </u>  | <u> </u>  | <u> </u>   |
| <u> </u>       | <u> </u>             | <u> </u>  | <u> </u>  | <u> </u>   |
| <u> </u>       | <u> </u>             | <u> </u>  | <u> </u>  | <u> </u>   |
| <u> </u>       | <u> </u>             | <u> </u>  | <u> </u>  | <u> </u>   |

<sup>1</sup>Use the following codes to designate byproduct, coproduct, or impurity:

B = Byproduct  
C = Coproduct  
I = Impurity

☐ Mark (X) this box if you attach a continuation sheet.

2.12 Existing Product Types -- List all existing product types which you manufactured, imported, or processed using the listed substance during the reporting year. List the quantity of listed substance you use for each product type as a percentage of the total volume of listed substance used during the reporting year. Also list the quantity of listed substance used captively on-site as a percentage of the value listed under column b., and the types of end-users for each product type. (Refer to ☐ the instructions for further explanation and an example.)

CBI

☐

| a.                         | b.  | c.   | d.                             |
|----------------------------|---|--|--------------------------------|
| Product Types <sup>1</sup> | % of Quantity<br>Manufactured,<br>Imported, or<br>Processed | % of Quantity<br>Used Captively<br>On-Site | Type of End-Users <sup>2</sup> |
| <u>K</u>                   | <u>100% Processed</u>                                       | <u>0</u>                                   | <u>I</u>                       |
|                            |   |  |                                |
|                            |   |  |                                |
|                            |   |  |                                |
|                            |   |  |                                |
|                            |   |  |                                |

<sup>1</sup>Use the following codes to designate product types:

|  |   |
|--|---|
| A = Solvent  | L = Moldable/Castable/Rubber and additives              |
| B = Synthetic reactant                             | M = Plasticizer   |
| C = Catalyst/Initiator/Accelerator/<br>Sensitizer  | N = Dye/Pigment/Colorant/Ink and additives              |
| D = Inhibitor/Stabilizer/Scavenger/<br>Antioxidant | O = Photographic/Reprographic chemical<br>and additives |
| E = Analytical reagent                             | P = Electrodeposition/Plating chemicals                 |
| F = Chelator/Coagulant/Sequestrant                 | Q = Fuel and fuel additives                             |
| G = Cleanser/Detergent/Degreaser                   | R = Explosive chemicals and additives                   |
| H = Lubricant/Friction modifier/Antiwear<br>agent  | S = Fragrance/Flavor chemicals                          |
| I = Surfactant/Emulsifier                          | T = Pollution control chemicals                         |
| J = Flame retardant                                | U = Functional fluids and additives                     |
| K = Coating/Binder/Adhesive and additives          | V = Metal alloy and additives                           |
|  | W = Rheological modifier                                |
|  | X = Other (specify) _____                               |

<sup>2</sup>Use the following codes to designate the type of end-users:

|                 |                           |
|-----------------|---------------------------|
| I = Industrial  | CS = Consumer             |
| CM = Commercial | H = Other (specify) _____ |

☐ Mark (X) this box if you attach a continuation sheet.

- 2.13 Expected Product Types -- Identify all product types which you expect to manufacture, import, or process using the listed substance at any time after your current corporate fiscal year. For each use, specify the quantity you expect to manufacture, import, or process for each use as a percentage of the total volume of listed substance used during the reporting year. Also list the quantity of listed substance used captively on-site as a percentage of the value listed under column b., and the types of end-users for each product type. (Refer to the instructions for further explanation and an example.)

CBI ☐

| a.                         | b.  | c.   | d.                             |
|----------------------------|---|--|--------------------------------|
| Product Types <sup>1</sup> | % of Quantity<br>Manufactured,<br>Imported, or<br>Processed | % of Quantity<br>Used Captively<br>On-Site | Type of End-Users <sup>2</sup> |
| <i>NA</i>                  | <i>NA</i>   | <i>NA</i>                                  | <i>NA</i>                      |
|                            |   |  |                                |
|                            |   |  |                                |
|                            |   |  |                                |
|                            |   |  |                                |
|                            |   |  |                                |

<sup>1</sup>Use the following codes to designate product types:

|  |   |
|--|---|
| A = Solvent  | L = Moldable/Castable/Rubber and additives              |
| B = Synthetic reactant                             | M = Plasticizer   |
| C = Catalyst/Initiator/Accelerator/<br>Sensitizer  | N = Dye/Pigment/Colorant/Ink and additives              |
| D = Inhibitor/Stabilizer/Scavenger/<br>Antioxidant | O = Photographic/Reprographic chemical<br>and additives |
| E = Analytical reagent                             | P = Electrodeposition/Plating chemicals                 |
| F = Chelator/Coagulant/Sequestrant                 | Q = Fuel and fuel additives                             |
| G = Cleanser/Detergent/Degreaser                   | R = Explosive chemicals and additives                   |
| H = Lubricant/Friction modifier/Antiwear<br>agent  | S = Fragrance/Flavor chemicals                          |
| I = Surfactant/Emulsifier                          | T = Pollution control chemicals                         |
| J = Flame retardant                                | U = Functional fluids and additives                     |
| K = Coating/Binder/Adhesive and additives          | V = Metal alloy and additives                           |
|  | W = Rheological modifier                                |
|  | X = Other (specify) _____                               |

<sup>2</sup>Use the following codes to designate the type of end-users:

|                 |                           |
|-----------------|---------------------------|
| I = Industrial  | CS = Consumer             |
| CM = Commercial | H = Other (specify) _____ |

☐ Mark (X) this box if you attach a continuation sheet.

2.14 Final Product -- Complete the following table for each type of final product CBI manufactured, imported, or processed at your facility that contains the listed substance other than as an impurity.

[ ]

| a.                        | b.   | c.   | d.                             |
|---------------------------|--|--|--------------------------------|
| Product Type <sup>1</sup> | Final Product's Physical Form <sup>2</sup> | Average % Composition of Listed Substance in Final Product | Type of End-Users <sup>3</sup> |
| <i>NA</i>                 | <i>NA</i>                                  | <i>NA</i>  | <i>NA</i>                      |
|                           |  |  |                                |
|                           |  |  |                                |
|                           |  |  |                                |
|                           |  |  |                                |

<sup>1</sup>Use the following codes to designate product types:

|  |  |
|--|--|
| A = Solvent                                    | L = Moldable/Castable/Rubber and additives           |
| B = Synthetic reactant                         | M = Plasticizer                                      |
| C = Catalyst/Initiator/Accelerator/Sensitizer  | N = Dye/Pigment/Colorant/Ink and additives           |
| D = Inhibitor/Stabilizer/Scavenger/Antioxidant | O = Photographic/Reprographic chemical and additives |
| E = Analytical reagent                         | P = Electrodeposition/Plating chemicals              |
| F = Chelator/Coagulant/Sequestrant             | Q = Fuel and fuel additives                          |
| G = Cleanser/Detergent/Degreaser               | R = Explosive chemicals and additives                |
| H = Lubricant/Friction modifier/Antiwear agent | S = Fragrance/Flavor chemicals                       |
| I = Surfactant/Emulsifier                      | T = Pollution control chemicals                      |
| J = Flame retardant                            | U = Functional fluids and additives                  |
| K = Coating/Binder/Adhesive and additives      | V = Metal alloy and additives                        |
|  | W = Rheological modifier                             |
|  | X = Other (specify) _____                            |

<sup>2</sup>Use the following codes to designate the final product's physical form:

|                      |                           |
|----------------------|---------------------------|
| A = Gas              | F2 = Crystalline solid    |
| B = Liquid           | F3 = Granules             |
| C = Aqueous solution | F4 = Other solid          |
| D = Paste            | G = Gel                   |
| E = Slurry           | H = Other (specify) _____ |
| F1 = Powder          |                           |

<sup>3</sup>Use the following codes to designate the type of end-users:

|                 |                           |
|-----------------|---------------------------|
| I = Industrial  | CS = Consumer             |
| CM = Commercial | H = Other (specify) _____ |

[ ] Mark (X) this box if you attach a continuation sheet.



2.15 Circle all applicable modes of transportation used to deliver bulk shipments of the  
CBI listed substance to off-site customers.

*Not Applicable*

- ☐ Truck ..... 1  
Railcar ..... 2  
Barge, Vessel ..... 3  
Pipeline ..... 4  
Plane ..... 5  
Other (specify) \_\_\_\_\_ 6

2.16 Customer Use -- Estimate the quantity of the listed substance used by your customers  
or prepared by your customers during the reporting year for use under each category  
CBI of end use listed (i-iv).

☐ Category of End Use

i. Industrial Products

Chemical or mixture ..... *Not App.* kg/yr  
Article ..... " " kg/yr

ii. Commercial Products

Chemical or mixture ..... *Not App.* kg/yr  
Article ..... " " kg/yr

iii. Consumer Products

Chemical or mixture ..... *Not App.* kg/yr  
Article ..... " " kg/yr

iv. Other

Distribution (excluding export) ..... *Not App* kg/yr  
Export ..... " " kg/yr  
Quantity of substance consumed as reactant ..... " " kg/yr  
Unknown customer uses ..... " " kg/yr

☐ Mark (X) this box if you attach a continuation sheet.

# SECTION 3 PROCESSOR RAW MATERIAL IDENTIFICATION

## PART A GENERAL DATA

- 3.01 Specify the quantity purchased and the average price paid for the listed substance for each major source of supply listed. Product trades are treated as purchases.  
**CBI** The average price is the market value of the product that was traded for the listed substance.

☐

| <u>Source of Supply</u>  | <u>Quantity<br/>(kg)</u> | <u>Average Price<br/>(\$/kg)</u> |
|--|--------------------------|----------------------------------|
| The listed substance was manufactured on-site.                               | <u>NA</u>                | <u>NA</u>                        |
| The listed substance was transferred from a different company site.          | <u>NA</u>                | <u>NA</u>                        |
| The listed substance was purchased directly from a manufacturer or importer. | <u>1.4 Kg</u>            | <u>\$31.53</u>                   |
| The listed substance was purchased from a distributor or repackager.         | <u>NA</u>                | <u>NA</u>                        |
| The listed substance was purchased from a mixture producer.                  | <u>NA</u>                | <u>NA</u>                        |

- 3.02 Circle all applicable modes of transportation used to deliver the listed substance to your facility.

☐

- ☒ Truck ..... ①
- Railcar ..... 2
- Barge, Vessel ..... 3
- Pipeline ..... 4
- Plane ..... 5
- Other (specify) \_\_\_\_\_ 6

☐ Mark (X) this box if you attach a continuation sheet.

3.03 a. Circle all applicable containers used to transport the listed substance to your facility.  
CBI

☐

Bags ..... 1  
Boxes ..... 2  
Free standing tank cylinders ..... 3  
Tank rail cars ..... 4  
Hopper cars ..... 5  
Tank trucks ..... 6  
Hopper trucks ..... 7  
Drums ..... 8  
Pipeline ..... 9  
Other (specify) \_\_\_\_\_ 10

b. If the listed substance is transported in pressurized tank cylinders, tank rail cars, or tank trucks, state the pressure of the tanks.

Tank cylinders ..... Not Applicable mmHg  
Tank rail cars ..... mmHg  
Tank trucks ..... mmHg

☐ Mark (X) this box if you attach a continuation sheet.

PART B RAW MATERIAL IN THE FORM OF A MIXTURE

3.04 If you obtain the listed substance in the form of a mixture, list the trade name(s) of the mixture, the name of its supplier(s) or manufacturer(s), an estimate of the average percent composition by weight of the listed substance in the mixture, and the amount of mixture processed during the reporting year.

CBI

☐

| <u>Trade Name</u> | <u>Supplier or Manufacturer</u> | <u>Average % Composition by Weight (specify <math>\pm</math> % precision)</u> | <u>Amount Processed (kg/yr)</u> |
|-------------------|---------------------------------|---|---------------------------------|
| Conathane ERV-11  | Conap, Inc.                     | Not listed  | 1.4                             |
|                   |                                 |   |                                 |
|                   |                                 |   |                                 |
|                   |                                 |   |                                 |

☐ Mark (X) this box if you attach a continuation sheet.

PART C RAW MATERIAL VOLUME

3.05 State the quantity of the listed substance used as a raw material during the reporting year in the form of a class I chemical, class II chemical, or polymer, and the percent composition, by weight, of the listed substance.

☐

|                   | Quantity Used<br>(kg/yr)    | % Composition by<br>Weight of Listed Sub-<br>stance in Raw Material<br>(specify $\pm$ % precision) |
|-------------------|-----------------------------|--|
| Class I chemical  | <u>1.4</u>                  | <u>&lt; 15% <math>\pm</math> NA</u>  |
|                   | <u>                    </u> | <u>                    </u>  |
|                   | <u>                    </u> | <u>                    </u>  |
| Class II chemical | <u>Not Applicable</u>       | <u>Not Applicable</u>  |
|                   | <u>                    </u> | <u>                    </u>  |
|                   | <u>                    </u> | <u>                    </u>  |
| Polymer           | <u>Not Applicable</u>       | <u>Not Applicable</u>  |
|                   | <u>                    </u> | <u>                    </u>  |
|                   | <u>                    </u> | <u>                    </u>  |

☐ Mark (X) this box if you attach a continuation sheet.

## SECTION 4 PHYSICAL/CHEMICAL PROPERTIES

### General Instructions:

If you are reporting on a mixture as defined in the glossary, reply to questions in Section 4 that are inappropriate to mixtures by stating "NA -- mixture."

For questions 4.06-4.15, if you possess any hazard warning statement, label, MSDS, or other notice that addresses the information requested, you may submit a copy or reasonable facsimile in lieu of answering those questions which it addresses.

### PART A PHYSICAL/CHEMICAL DATA SUMMARY

- "NA -- mixture"*
- 4.01 Specify the percent purity for the three major<sup>1</sup> technical grade(s) of the listed substance as it is manufactured, imported, or processed. Measure the purity of the substance in the final product form for manufacturing activities, at the time you import the substance, or at the point you begin to process the substance.

☐

|                    | <u>Manufacture</u> | <u>Import</u>  | <u>Process</u> |
|--------------------|--------------------|----------------|----------------|
| Technical grade #1 | _____ % purity     | _____ % purity | _____ % purity |
| Technical grade #2 | _____ % purity     | _____ % purity | _____ % purity |
| Technical grade #3 | _____ % purity     | _____ % purity | _____ % purity |

<sup>1</sup>Major = Greatest quantity of listed substance manufactured, imported or processed.

- 4.02 Submit your most recently updated Material Safety Data Sheet (MSDS) for the listed substance, and for every formulation containing the listed substance. If you possess an MSDS that you developed and an MSDS developed by a different source, submit your version. Indicate whether at least one MSDS has been submitted by circling the appropriate response.

☒ Yes ..... 1

No ..... 2

Indicate whether the MSDS was developed by your company or by a different source.

Your company ..... 1

☒ Another source ..... 2

☐

Mark (X) this box if you attach a continuation sheet.

SC001054

C O N A P I N C .  
1405 Buffalo St.  
Olean, New York 14760  
716/372-9650

===== MATERIAL SAFETY DATA SHEET =====  
Note: This form is to be used to comply with OSHA's Hazard Communication Standard, 29 CFR 1910.1200. Blank spaces are not permitted.

===== I. IDENTIFICATION =====

Trade Name Conathane EN-11 Part A Date: 5/25/89  
Chemical Name, common name: Complex Mixture; Polyurethane  
Prepolymer

===== II. HAZARDOUS INGREDIENTS =====

| Chemical Names | CAS No.          | %        | ACGIH(TLV) | OSHA(PEL)   | Other          |
|----------------|------------------|----------|------------|-------------|----------------|
| Toluene        | 2,4 Diisocyanate | 584-84-9 | <15%       | .005ppm TWA |                |
|                |                  |          |            | .005ppm TWA | .02ppm STEL ND |

-----  
Material may present a dust hazard if cut, ground or machined after curing.

===== III. PHYSICAL DATA =====

Boiling Point ND !Specific Gravity (H2O=1) 1.06  
Vapor Pressure, mm Hg ND !Vapor Density (air=1) ND  
Melting Pt./Range ND !Evaporation rate (Ether=1) ND  
Solubility in Water: REACTS!Physical State: LIQUID  
Percent volatile by volume: Negligible  
Appearance and Odor: Liquid; For TDI Sharp pungent (odor threshold greater than TLV)

===== IV. FIRE AND EXPLOSION DATA =====

Flash Point, F (Method): > 260 F PMCC  
Flammable Limits ND LEL ND UEL ND  
Extinguishing Materials:  
-XX-Water Spray -XX-Dry Chemical -XX-Carbon Dioxide  
-XX-Foam -ND-Other:  
Special Firefighting Procedures/Unusual Fire or Explosion Hazards:

Full emergency equipment with self-contained breathing apparatus and full protective clothing should be worn by fire fighters. No skin surface should be exposed. During a fire TDI vapors and other irritating, highly toxic gases may be generated by thermal decomposition or combustion. At temperatures greater than 350 F TDI forms carbodiimides with the release of CO2 which can cause pressure build-up in closed containers. Explosive rupture is possible. Therefore, use cold water to cool fire-exposed containers.

===== V. HEALTH HAZARD INFORMATION =====

ACUTE TOXICITY (Routes of entry)

Inhalation:

LC50.(4 hr.): Range 16-50ppm for 1-4 hr (Rat) on TDI. TDI

vapors or mist at concentrations above the TLV can irritate (burning sensation) the mucous membranes in the respiratory tract (nose, throat, lungs) causing runny nose, sore throat, coughing, chest discomfort, shortness of breath and reduced lung function (breathing obstruction). Persons with a preexisting, nonspecific bronchial hyperactivity can respond to concentrations below the TLV with similar symptoms as well as asthma attack. Exposure well above the TLV may lead to bronchitis, bronchial spasm and pulmonary edema (fluid in the lungs). These effects are usually reversible. Chemical or hypersensitive pneumonitis, with flu-like symptoms (e.g. fever, chills), has also been reported. These symptoms can be delayed up to several hours after exposure.

**Ingestion:**

ORAL, LD50 > 5800 mg/kg (Rats). Can result in irritation and corrosive action in the mouth, stomach tissue and digestive tract. Symptoms can include sore throat, abdominal pain, nausea, vomiting and diarrhea.

**Eye Contact:**

Strongly irritating (Rabbits) OECD Guidelines. Liquid, aerosols or vapors are severely irritating and can cause pain, tearing, reddening and swelling. If left untreated, corneal damage can occur and injury is slow to heal. however, damage is usually reversible.

**Skin Contact:**

Skin sensitizer in guinea pigs. One study with guinea pigs reported that repeated skin contact with TDI caused respiratory sensitization. Isocyanates react with skin protein and moisture and can cause irritation which may include the following symptoms: reddening, swelling, rash, scaling or blistering. Cured material is difficult to remove.

**Skin Absorption:**

ND

-----  
**CHRONIC TOXICITY**

**Carcinogenicity:**

--X-Yes:      --X---NTP      --X----IARC      ----Federal OSHA

In a DRAFT of a lifetime bioassay, the National Toxicology Program reported that TDI caused an increase in the number of tumors in exposed rats over those counted in non-exposed rats. The TDI was administered by gavage where TDI was introduced into the stomach through a tube. In lifetime inhalation studies conducted by Hazelton Labs for the International Isocyanate Institute, TDI did NOT demonstrate carcinogenic activity in rats or mice.

**Target Organ Affected:**

No specific information available.

Effects of Overexposure:



#### Inhalation:

Inhalation of TDI vapors at concentrations above allowable limits can produce irritation of the mucous membranes in the respiratory tract resulting in running nose, sore throat, productive cough and a reduction in lung function (breathing obstruction). As a result of previous repeated overexposures or a single large dose, certain individuals may develop isocyanate sensitization (chemical asthma) which will cause them to react to a later exposure to isocyanate at levels well below the TLV. Another type of response is hyperreactivity or hypersensitivity, in which persons, (as a result of a previous repeated overexposure or large single dose), can respond to small TDI concentrations at levels well below the .02ppm. Symptoms could be immediate or delayed and include chest tightness, wheezing, cough, shortness of breath or asthmatic attack. Hypersensitivity pneumonitis (with similar respiratory symptoms and fever which has been delayed) has also been reported. Similar to many non-specific asthmatic responses, there are reports that once sensitized an individual can experience these symptoms upon exposure to dust, cold air or other irritants. This increased lung sensitivity can persist for weeks and in severe cases for several years. Chronic overexposure to isocyanate has also been reported to cause lung damage (including decrease in lung function) which may be permanent. Sensitization can either be temporary or permanent.

#### Eyes:

Liquid, vapors or aerosols are severely irritating to the eyes and can cause tears. Prolonged vapor contact may cause conjunctivitis. Corneal injury can occur which can be slow to heal; however damage is usually reversible.

#### Skin:

TDI reacts with skin protein and tissue moisture and can cause localized irritation as well as discoloration. Prolonged contact could produce reddening, swelling, or blistering and, in some individuals, skin sensitization resulting in dermatitis. Once sensitized a individual can develop recurring symptoms as a result of exposure to vapor.

#### Ingestion:

Ingestion could result in irritation and some corrosive action in the mouth, stomach tissue and digestive tract. Symptoms can include sore throat, abdominal pain, nausea, vomiting and diarrhea.

---

#### Medical Conditions Aggravated By Exposure

Asthma, other respiratory disorders (bronchitis, emphysema, bronchial hyperreactivity), skin allergies, eczema.

---

## FIRST AID: EMERGENCY PROCEDURES

### Eye Contact:

Flush with clean, lukewarm water (low pressure) for at least 15 minutes, occasionally lifting eyelids, and obtain medical attention. Refer individual to an ophthalmologist for immediate follow-up.

### Skin Contact:

Remove contaminated clothing. Wash effected areas thoroughly with soap or tincture of green soap and water. Wash contaminated clothing thoroughly before reuse. For severe exposures, get under safety shower, remove clothing under shower, get medical attention, and consult physician.

### Inhalation:

Move to an area free from risk of further exposure. Administer oxygen or artificial respiration as needed. Obtain medical attention. Asthmatic-type symptoms may develop and be immediate or delayed up to several hours. Consult physician.

### Ingested:

Do not induce vomiting. Give 12 fl. oz. of milk or water to drink. DO NOT GIVE ANYTHING BY MOUTH TO AN UNCONSCIOUS PERSON. Consult physician.

### Recommendations to Physician:

Eyes: Stain for evidence of corneal injury. If cornea is burned, instill antibiotic steroid preparation frequently. Workplace vapors have produced reversible corneal epithelial edema impairing vision. This compound is a known skin sensitizer. Treat symptomatically as for contact dermatitis or thermal burns. There is no specific antidote for ingestion treat symptomatically. Inducing vomiting is contraindicated because of the irritating nature of this compound. TDI is a known pulmonary sensitizer. Treatment is essentially symptomatic. An individual having a skin or pulmonary sensitization reaction to this material should be removed from exposure to any isocyanate.

## ===== VI. REACTIVITY DATA =====

Stability:                      --XX-Stable                      -NA--Unstable

Conditions to Avoid: Temperatures higher than recommended in product literature.

Incompatibility (materials to avoid):

Water, short chain alcohols, amines

Hazardous Decomposition Products

By heat and fire: carbon dioxide, carbon monoxide, oxides of nitrogen and traces of hydrogen cyanide, TDI.

Hazardous Polymerization: NA-May Occur      X-Will not occur

Conditions to avoid:

ND

## ===== VII. SPILL, LEAK AND DISPOSAL PROCEDURES =====

Steps to be taken if material is released or spilled:

Consult section VIII for proper protective equipment.

Cover the spill with sawdust, vermiculite, Fuller's earth or other absorbent material. Pour decontamination solution over the spill area and allow to react for at least 10 minutes. Collect the material in open top containers and add additional amounts of decontamination solution. Remove containers to a safe place, cover loosely, and allow to stand for 24 to 48 hours. Wash down spill area with decontamination solutions. Decontamination solutions: non-ionic surfactant Union Carbide's Tergitol TMN-10(20%) and water (80%); or concentrated ammonia (3-8%), detergent (2%), and water (90%). During spill clean-up, a self contained breathing apparatus or air line respirator and protective clothing must be worn. (See section VIII). Reportable Quantity CERCLA: 100lbs

Waste Disposal Method:

Dispose according to any Local, State and Federal Regulations.

===== VIII. SPECIAL HANDLING INFORMATION =====

Respiratory Protection:

A positive pressure air-supplied respirator is required whenever TDI concentrations exceed the Short-Term Exposure or Ceiling Limit of .02ppm or exceed the 8 hour Time Weighted Average TLV of 0.005 ppm. An air supplied respirator must also be worn during spray application, even if exhaust ventilation is used. For non-spray , short-term(less than 1 hour) situations where concentrations are near the TLV, a full face, air-purifying respirator equipped with organic cartridges or canisters can be used. However, TDI has poor warning properties since the odor at which TDI can be smelled is substantially higher than the 0.02 ppm. Therefore, proper fit and timely replacement of filter elements must be ensured. Observe OSHA regulations for respirator use. (29CFR 1910.134).

Ventilation:

Local exhaust should be used to maintain levels below the TLV whenever TDI containing material is handled, processed, or spray-applied. At normal room temperatures (70 F) TDI levels quickly exceed the TLV unless properly ventilated. Standard reference sources regarding industrial ventilation (e.g., ACGIH INDUSTRIAL VENTILATION) should be consulted for guidance about adequate ventilation.

Protective Gloves: Chemical resistant gloves (butyl rubber, nitrile rubber, polyvinyl alcohol). However, please note that PVA degrades in water.

Eye Protection:

Liquid chemical goggles or full face shield should be worn. Contact lenses should not be worn.

Other Protective Clothing or Equipment: Safety showers and eyewash stations should be available. Cover as much of exposed skin as possible with appropriate clothing.

Work Practices, hygienic practices  
Educate and train employees in safe use of product. Follow  
all label instructions.

===== IX SPECIAL PRECAUTIONS =====

Handling and Storage:

Store in tightly closed containers to prevent moisture  
contamination. Do not reseal if contamination is suspect.

Other Precautions:

Avoid contact with eyes and skin. Do not breathe the  
vapors.

===== X ADDITIONAL INFORMATION =====

SARA Title III Requirements:

TDI is on the Extremely Hazardous Substance.

| Chemical Name            | Section:    | 302        | CERCLA | 313 |
|--------------------------|-------------|------------|--------|-----|
| Toluene 2,4 Diisocyanate | TPQ-500 LBS | RQ-100 LBS | YES    |     |

T.S.C.A. Status: On Inventory

=====

Name(print): George C. Karpin !This formulation is subject  
Signature: *George C. Karpin* !to change without notice.  
Title: Toxicological Coordinator!In case of accident use the  
Date of last revision 5/25/89!phone number provided.

-----

To the best of our knowledge, the information contained  
herein is accurate and meets all state and federal  
guidelines. However, CONAP INC. does not assume any liability  
whatsoever for the accuracy or completeness of the  
information contained herein. All materials may present  
unknown hazards and should be used with caution. Although  
certain hazards are described herein, we cannot guarantee  
that these are the only hazards which exist. Final  
determination of the suitability of any material is the  
sole responsibility of the user.

////////////////////////////////////

Date approved 5/26/89 Approved: *Will J. Pallas*  
ND=Not Determined  
NA=Not Applicable 5/26/89 Approved: *Robert Williamson*

4.03 Submit a copy or reasonable facsimile of any hazard information (other than an MSDS) that is provided to your customers/users regarding the listed substance or any formulation containing the listed substance. Indicate whether this information has been submitted by circling the appropriate response.

Yes ..... 1

☒ No ..... ☒ 2

4.04 For each activity that uses the listed substance, circle all the applicable number(s) corresponding to each physical state of the listed substance during the activity listed. Physical states for importing and processing activities are determined at the time you import or begin to process the listed substance. Physical states for manufacturing, storage, disposal and transport activities are determined using the final state of the product.

CBI

☐

| Activity    | Physical State |                                    |                                    |               |     |
|-------------|----------------|------------------------------------|------------------------------------|---------------|-----|
|             | Solid          | Slurry                             | Liquid                             | Liquified Gas | Gas |
| Manufacture | 1              | 2                                  | 3                                  | 4             | 5   |
| Import      | 1              | 2                                  | 3                                  | 4             | 5   |
| Process     | 1              | <input checked="" type="radio"/> 2 | <input checked="" type="radio"/> 3 | 4             | 5   |
| Store       | 1              | 2                                  | 3                                  | 4             | 5   |
| Dispose     | 1              | 2                                  | 3                                  | 4             | 5   |
| Transport   | 1              | 2                                  | 3                                  | 4             | 5   |

☐ Mark (X) this box if you attach a continuation sheet.

- 4.05 Particle Size -- If the listed substance exists in particulate form during any of the following activities, indicate for each applicable physical state the size and the percentage distribution of the listed substance by activity. Do not include particles  $\geq 10$  microns in diameter. Measure the physical state and particle sizes for importing and processing activities at the time you import or begin to process the listed substance. Measure the physical state and particle sizes for manufacturing storage, disposal and transport activities using the final state of the product.

CBI

☐

*Not Applicable*

Physical  
State

Manufacture   Import   Process   Store   Dispose   Transport

Dust                      <1 micron

1 to <5 microns

5 to <10 microns

Powder                      <1 micron

1 to <5 microns

5 to <10 microns

Fiber                      <1 micron

1 to <5 microns

5 to <10 microns

Aerosol                      <1 micron

1 to <5 microns

5 to <10 microns

☐ Mark (X) this box if you attach a continuation sheet.

---

SECTION 5 ENVIRONMENTAL FATE

---

PART A RATE CONSTANTS AND TRANSFORMATION PRODUCTS

---

5.01 Indicate the rate constants for the following transformation processes.

a. Photolysis:

Absorption spectrum coefficient (peak) .... UK (1/M cm) at \_\_\_\_\_ nm  
Reaction quantum yield,  $\phi$  ..... UK at \_\_\_\_\_ nm  
Direct photolysis rate constant,  $k_p$ , at ... UK 1/hr \_\_\_\_\_ latitude

b. Oxidation constants at 25°C:

For  $^1O_2$  (singlet oxygen),  $k_{ox}$  ..... UK 1/M hr  
For  $RO_2$  (peroxy radical),  $k_{ox}$  ..... UK 1/M hr

c. Five-day biochemical oxygen demand,  $BOD_5$  ... UK mg/l

d. Biotransformation rate constant:

For bacterial transformation in water,  $k_b$ ... UK 1/hr  
Specify culture ..... UK

e. Hydrolysis rate constants:

For base-promoted process,  $k_b$  ..... UK 1/M hr  
For acid-promoted process,  $k_a$  ..... UK 1/M hr  
For neutral process,  $k_n$  ..... UK 1/hr

f. Chemical reduction rate (specify conditions) UK

g. Other (such as spontaneous degradation) ... UK

---

☐ Mark (X) this box if you attach a continuation sheet.

---

5.02 a. Specify the half-life of the listed substance in the following media.

b. Identify the listed substance's known transformation products that have a half-life greater than 24 hours.

5.03 Specify the octanol-water partition coefficient,  $K_{ow}$  ... UK at 25°C

Method of calculation or determination .....

5.04 Specify the soil-water partition coefficient,  $K_d$  ..... UK at 25°C

Soil type .....

5.05 Specify the organic carbon-water partition coefficient,  $K_{oc}$  ..... UK at 25°C

5.06 Specify the Henry's Law Constant, H ..... 45 atm-m<sup>3</sup>/mole

36



5.07 List the bioconcentration factor (BCF) of the listed substance, the species for which it was determined, and the type of test used in deriving the BCF.

Bioconcentration Factor

Species

Test<sup>1</sup>

UK

UK

UK

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

<sup>1</sup>Use the following codes to designate the type of test:

F = Flowthrough

S = Static

☐ Mark (X) this box if you attach a continuation sheet.

6.04 For each market listed below, state the quantity sold and the total sales value of the listed substance sold or transferred in bulk during the reporting year.

☐

*Not Applicable*

| <u>Market</u>                              | <u>Quantity Sold or Transferred (kg/yr)</u> | <u>Total Sales Value (\$/yr)</u> |
|--|---|----------------------------------|
| Retail sales                               | _____                                       | _____                            |
| Distribution -- Wholesalers                | _____                                       | _____                            |
| Distribution -- Retailers                  | _____                                       | _____                            |
| Intra-company transfer                     | _____                                       | _____                            |
| Repackagers                                | _____                                       | _____                            |
| Mixture producers                          | _____                                       | _____                            |
| Article producers                          | _____                                       | _____                            |
| Other chemical manufacturers or processors | _____                                       | _____                            |
| Exporters                                  | _____                                       | _____                            |
| Other (specify)                            | _____                                       | _____                            |
| _____                                      | _____                                       | _____                            |

6.05 Substitutes -- List all known commercially feasible substitutes that you know exist for the listed substance and state the cost of each substitute. A commercially feasible substitute is one which is economically and technologically feasible to use in your current operation, and which results in a final product with comparable performance in its end uses.

CBI

☐

| <u>Substitute</u> | <u>Cost (\$/kg)</u> |
|-------------------|---------------------|
| <i>UB</i>         | <i>UB</i>           |
| _____             | _____               |
| _____             | _____               |
| _____             | _____               |

☐ Mark (X) this box if you attach a continuation sheet.

# SECTION 7 MANUFACTURING AND PROCESSING INFORMATION

## General Instructions:

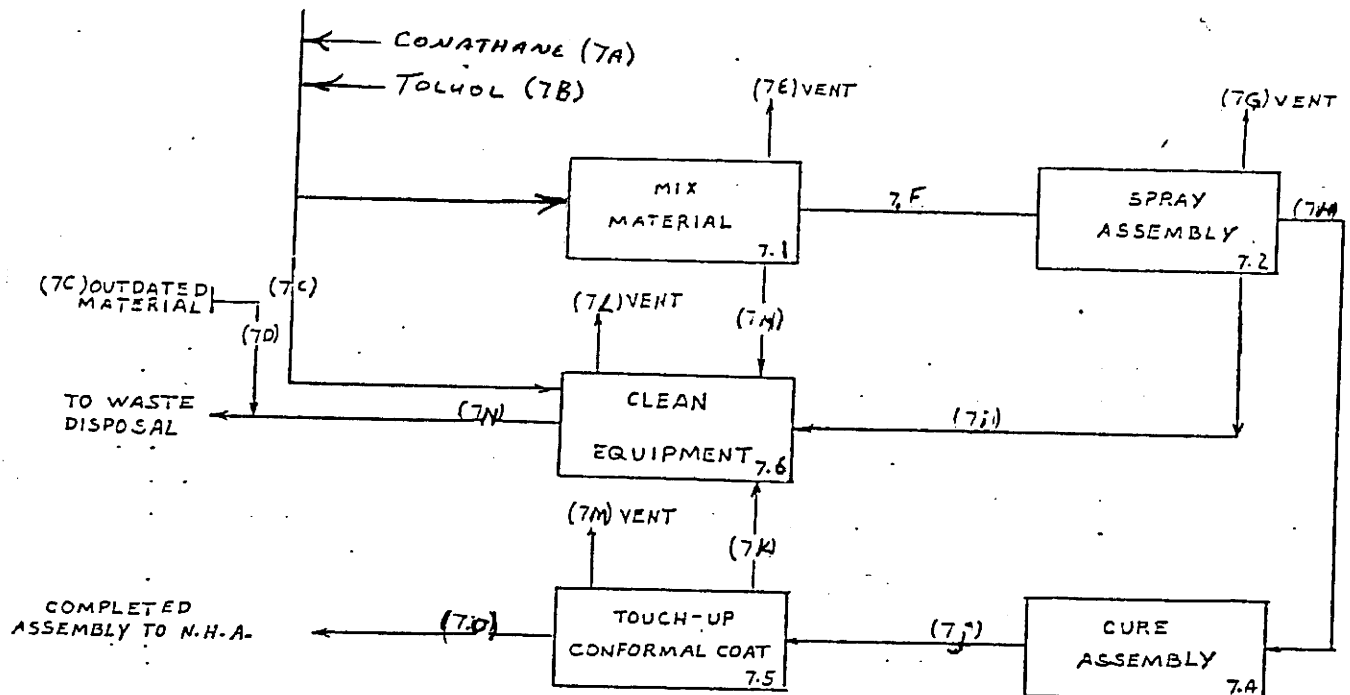
For questions 7.04-7.06, provide a separate response for each process block flow diagram provided in questions 7.01, 7.02, and 7.03. Identify the process type from which the information is extracted.

## PART A MANUFACTURING AND PROCESSING PROCESS TYPE DESCRIPTION

7.01 In accordance with the instructions, provide a process block flow diagram showing major (greatest volume) process type involving the listed substance.

CBI

☐ Process type ..... VACUUM IMPREGNATION OF TRANSFORMERS/CHOICES



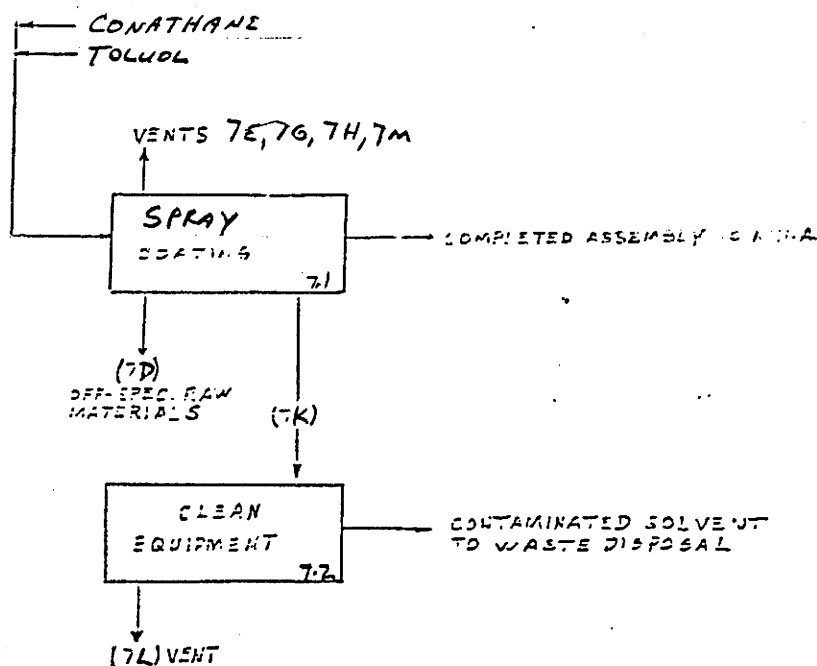
☐ Mark (X) this box if you attach a continuation sheet.

CONATHANE-H4DL

7.03 In accordance with the instructions, provide a process block flow diagram showing process emission streams and emission points that contain the listed substance and which, if combined, would total at least 90 percent of all facility emissions if treated before emission into the environment. If all such emissions are released from one process type, provide a process block flow diagram using the instructions for question 7.01. If all such emissions are released from more than one process type, provide a process block flow diagram showing each process type as a separate block.

CBI

☐ Process type ..... VACUUM IMPREGNATION OF TRANSFORMERS / CHOKES



TDI Emissions

7E Material Mix Station Vent  
 7G Spray Assembly Vent  
 7L Equipment Cleaning Vent  
 7M Touch Up Station Vent

☐ Mark (X) this box if you attach a continuation sheet.

7.04 Describe the typical equipment types for each unit operation identified in your process block flow diagram(s). If a process block flow diagram is provided for more than one process type, photocopy this question and complete it separately for each process type.

CBI

☐ Process type ..... Vacuum Impregnation of Transformers

| Unit<br>Operation<br>ID<br>Number | Typical<br>Equipment<br>Type | Operating<br>Temperature<br>Range (°C) | Operating<br>Pressure<br>Range<br>(mm Hg) | Vessel<br>Composition |
|-----------------------------------|------------------------------|--|---|-----------------------|
| <u>7.1</u>                        | <u>Weighing Balance</u>      | <u>Ambient</u>                         | <u>Atmospheric</u>                        | <u>NA</u>             |
| <u>7.2</u>                        | <u>Spray Gun</u>             | <u>Ambient</u>                         | <u>Atmospheric</u>                        | <u>NA</u>             |
| <u>7.4</u>                        | <u>Back or Bench</u>         | <u>Ambient</u>                         | <u>Atmospheric</u>                        | <u>NA</u>             |
| <u>7.5</u>                        | <u>Spray Gun</u>             | <u>Ambient</u>                         | <u>Atmospheric</u>                        | <u>NA</u>             |
| <u>7.6</u>                        | <u>Tray</u>                  | <u>Ambient</u>                         | <u>Atmospheric</u>                        | <u>NA</u>             |
| <u>7.4</u>                        | <u>Vacuum Oven</u>           | <u>Ambient</u>                         | <u>Atmospheric</u>                        | <u>NA</u>             |
| _____                             | _____                        | _____                                  | _____                                     | _____                 |
| _____                             | _____                        | _____                                  | _____                                     | _____                 |
| _____                             | _____                        | _____                                  | _____                                     | _____                 |
| _____                             | _____                        | _____                                  | _____                                     | _____                 |

☐ Mark (X) this box if you attach a continuation sheet.

7.05 Describe each process stream identified in your process block flow diagram(s). If a process block flow diagram is provided for more than one process type, photocopy this question and complete it separately for each process type.

CBI

☐ Process type ..... Vacuum Impregnation of Transformers

| Process Stream ID Code | Process Stream Description          | Physical State <sup>1</sup> | Stream Flow (kg/yr) |
|------------------------|-------------------------------------|-----------------------------|---------------------|
| <u>7F, 7H, 7I, 7J</u>  | <u>Conathane (TDI)</u>              | <u>OL</u>                   | <u>UK</u>           |
| <u>7D</u>              | <u>Off-spec Conathane</u>           | <u>OL</u>                   | <u>UK</u>           |
| <u>7N</u>              | <u>Toluol (80%) Conathane (20%)</u> | <u>OL</u>                   | <u>UK</u>           |
| <u>7E, 7G, 7L, 7M</u>  | <u>Hooded Assembly Bench</u>        | <u>GU</u>                   | <u>UK</u>           |
| _____                  | _____                               | _____                       | _____               |
| _____                  | _____                               | _____                       | _____               |
| _____                  | _____                               | _____                       | _____               |
| _____                  | _____                               | _____                       | _____               |

<sup>1</sup>Use the following codes to designate the physical state for each process stream:

- GC = Gas (condensable at ambient temperature and pressure)
- GU = Gas (uncondensable at ambient temperature and pressure)
- SO = Solid
- SY = Sludge or slurry
- AL = Aqueous liquid
- OL = Organic liquid
- IL = Immiscible liquid (specify phases, e.g., 90% water, 10% toluene)

☐ Mark (X) this box if you attach a continuation sheet.

7.06 Characterize each process stream identified in your process block flow diagram(s). If a process block flow diagram is provided for more than one process type, photocopy this question and complete it separately for each process type. (Refer to the CBI instructions for further explanation and an example.)

☐ Process type ..... Vacuum Impregnation of Transformers

| a.                     | b.                           | c.                                       | d.                       | e.                                  |
|------------------------|------------------------------|--|--------------------------|-------------------------------------|
| Process Stream ID Code | Known Compounds <sup>1</sup> | Concentrations <sup>2,3</sup> (% or ppm) | Other Expected Compounds | Estimated Concentrations (% or ppm) |
| <u>7F, 7H</u>          | <u>TDI / Toluene</u>         | <u>NA</u>                                | <u>NA</u>                | <u>UK</u>                           |
| <u>7I, 7J</u>          | <u>"</u>                     | <u>"</u>                                 | <u>"</u>                 | <u>"</u>                            |
| <u>7D, 7N</u>          | <u>TDI / Toluene</u>         | <u>NA</u>                                | <u>NA</u>                | <u>UK</u>                           |
| <u>7E, 7G</u>          | <u>TDI / Toluene</u>         | <u>NA</u>                                | <u>NA</u>                | <u>UK</u>                           |
| <u>7L, 7M</u>          |                              |  |                          |                                     |

7.06 continued below

☐ Mark (X) this box if you attach a continuation sheet.

*Not Applicable*

<sup>1</sup>For each additive package introduced into a process stream, specify the compounds that are present in each additive package, and the concentration of each component. Assign an additive package number to each additive package and list this number in column b. (Refer to the instructions for further explanation and an example. Refer to the glossary for the definition of additive package.)

| <u>Additive<br/>Package Number</u> | <u>Components of<br/>Additive Package</u> | <u>Concentrations<br/>(% or ppm)</u> |
|------------------------------------|---|--------------------------------------|
| <u>1</u>                           |   |                                      |
|                                    |   |                                      |
|                                    |   |                                      |
| <u>2</u>                           |   |                                      |
|                                    |   |                                      |
|                                    |   |                                      |
| <u>3</u>                           |   |                                      |
|                                    |   |                                      |
|                                    |   |                                      |
| <u>4</u>                           |   |                                      |
|                                    |   |                                      |
|                                    |   |                                      |
| <u>5</u>                           |   |                                      |
|                                    |   |                                      |
|                                    |   |                                      |

<sup>2</sup>Use the following codes to designate how the concentration was determined:

A = Analytical result

E = Engineering judgement/calculation

<sup>3</sup>Use the following codes to designate how the concentration was measured:

V = Volume

W = Weight

☐ Mark (X) this box if you attach a continuation sheet.



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SECTION 8 RESIDUAL TREATMENT GENERATION, CHARACTERIZATION, TRANSPORTATION, AND  
MANAGEMENT

---

General Instructions:

For questions 8.04-8.06, provide a separate response for each residual treatment block flow diagram provided in question 8.01, 8.02 or 8.03. Identify the process type from which the information is extracted.

For questions 8.05-8.33, the Stream Identification Codes are those process streams listed in either the Section 7 or Section 8 block flow diagrams which contain residuals for each applicable waste management method.

For questions 8.07-8.33, if residuals are combined before they are handled, list those Stream Identification Codes on the same line.

Questions 8.09-8.33 refer to the waste management activities involving the residuals identified in either the Section 7 or Section 8 block flow diagrams. Not all Stream Identification Codes used in the sample answers (e.g., for the incinerator questions) have corresponding process streams identified in the block flow diagram(s). These Stream Identification codes are for illustrative purposes only.

For questions 8.11-8.33, if you have provided the information requested on one of the EPA Office of Solid Waste surveys listed below within the three years prior to your reporting year, you may submit a copy or reasonable facsimile in lieu of answering those questions which the survey addresses. The applicable surveys are: (1) Hazardous Waste Treatment, Storage, Disposal, and Recycling Survey; (2) Hazardous Waste Generator Survey; or (3) Subtitle D Industrial Facility Mail Survey.

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☐ Mark (X) this box if you attach a continuation sheet.

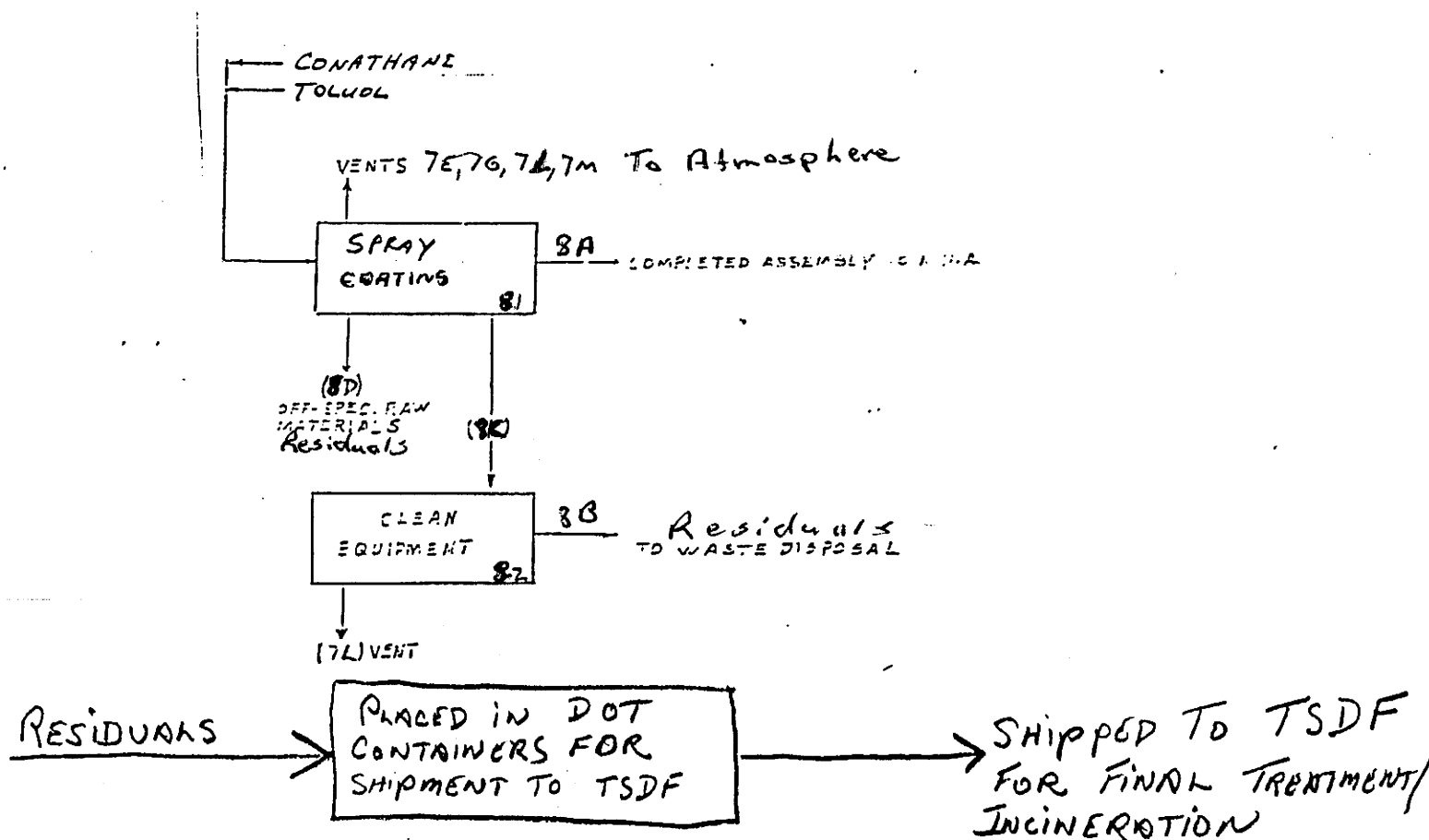
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PART A RESIDUAL TREATMENT PROCESS DESCRIPTION

8.01 In accordance with the instructions, provide a residual treatment block flow diagram which describes the treatment process used for residuals identified in question 7.0

CBI

☐ Process type ..... Vacuum Impregnation of Transformers



ALL RESIDUALS ARE STORED UNTILL SHIPPED OFF SITE TO A BROKER WHO INTURN WILL SHIP THE MATERIAL FOR FINAL TREATMENT OR INCINERATION. NO ON SITE TREATMENT OR INCINERATION OCCURES.

☐ Mark (X) this box if you attach a continuation sheet.

PART B RESIDUAL GENERATION AND CHARACTERIZATION

8.05 Characterize each process stream identified in your residual treatment block flow diagram(s). If a residual treatment block flow diagram is provided for more than one process type, photocopy this question and complete it separately for each process type. (Refer to the instructions for further explanation and an example.)

[ ] Process type ..... Varcum Impregnation of Transformers

a.                      b.                      c.                      d.                      e.                      f.                      g.

[illegible]

8.05 continued below

☐ Mark (X) this box if you attach a continuation sheet.

---

8.05 (continued)

<sup>1</sup>Use the following codes to designate the type of hazardous waste:

I = Ignitable  
C = Corrosive  
R = Reactive  
E = EP toxic  
T = Toxic  
H = Acutely hazardous

<sup>2</sup>Use the following codes to designate the physical state of the residual:

GC = Gas (condensable at ambient temperature and pressure)  
GU = Gas (uncondensable at ambient temperature and pressure)  
SO = Solid  
SY = Sludge or slurry  
AL = Aqueous liquid  
OL = Organic liquid  
IL = Immiscible liquid (specify phases, e.g., 90% water, 10% toluene)

---

8.05 continued below

---

☐ Mark (X) this box if you attach a continuation sheet.

---

8.05 (continued)

*Not Applicable*

<sup>3</sup>For each additive package introduced into a process stream, specify the compounds that are present in each additive package, and the concentration of each component. Assign an additive package number to each additive package and list this number in column d. (Refer to the instructions for further explanation and an example. Refer to the glossary for the definition of additive package.)

| <u>Additive<br/>Package Number</u> | <u>Components of<br/>Additive Package</u> | <u>Concentrations<br/>(% or ppm)</u> |
|------------------------------------|---|--------------------------------------|
| <u>1</u>                           | <hr/> <hr/> <hr/>                         | <hr/> <hr/> <hr/>                    |
| <u>2</u>                           | <hr/> <hr/> <hr/>                         | <hr/> <hr/> <hr/>                    |
| <u>3</u>                           | <hr/> <hr/> <hr/>                         | <hr/> <hr/> <hr/>                    |
| <u>4</u>                           | <hr/> <hr/> <hr/>                         | <hr/> <hr/> <hr/>                    |
| <u>5</u>                           | <hr/> <hr/> <hr/>                         | <hr/> <hr/> <hr/>                    |

<sup>4</sup>Use the following codes to designate how the concentration was determined:

A = Analytical result

E = Engineering judgement/calculation

8.05 continued below

☐ Mark (X) this box if you attach a continuation sheet.

8.05 (continued)

*Not Applicable*

<sup>5</sup>Use the following codes to designate how the concentration was measured:

V = Volume

W = Weight

<sup>6</sup>Specify the analytical test methods used and their detection limits in the table below. Assign a code to each test method used and list those codes in column e.

| <u>Code</u> | <u>Method</u> | Detection Limit<br>( $\pm$ ug/l) |
|-------------|---------------|----------------------------------|
| <u>1</u>    |               |                                  |
| <u>2</u>    |               |                                  |
| <u>3</u>    |               |                                  |
| <u>4</u>    |               |                                  |
| <u>5</u>    |               |                                  |
| <u>6</u>    |               |                                  |

☐ Mark (X) this box if you attach a continuation sheet.

8.06 Characterize each process stream identified in your residual treatment block flow diagram(s). If a residual treatment block flow diagram is provided for more than one process type, photocopy this question and complete it separately for each process type. (Refer to the instructions for further explanation and an example.)

CBI

☐ Process type ..... Vacuum Impregnation of Transformers

| a.             | b.                                  | c.                                  | d.                          | e.                         |            | f.                                     | g.                            |
|----------------|-------------------------------------|-------------------------------------|-----------------------------|----------------------------|------------|--|-------------------------------|
| Stream ID Code | Waste Description Code <sup>1</sup> | Management Method Code <sup>2</sup> | Residual Quantities (kg/yr) | Management of Residual (%) |            | Costs for Off-Site Management (per kg) | Changes in Management Methods |
| <u>7E</u>      | <u>B91</u>                          | <u>M5</u>                           | <u>UK</u>                   | <u>UK</u>                  | <u>NA</u>  | <u>UK</u>                              | <u>UK</u>                     |
| <u>7G</u>      |                                     | <u>"</u>                            | <u>"</u>                    | <u>"</u>                   | <u>"</u>   | <u>"</u>                               | <u>"</u>                      |
| <u>7L</u>      |                                     | <u>"</u>                            | <u>"</u>                    | <u>"</u>                   | <u>"</u>   | <u>"</u>                               | <u>"</u>                      |
| <u>7M</u>      |                                     | <u>"</u>                            | <u>"</u>                    | <u>"</u>                   | <u>"</u>   | <u>"</u>                               | <u>"</u>                      |
| <u>8B</u>      | <u>B70</u>                          | <u>11I</u>                          | <u>UK</u>                   | <u>0</u>                   | <u>100</u> | <u>UK</u>                              | <u>UK</u>                     |
|                |                                     |                                     |                             |                            |            |  |                               |
|                |                                     |                                     |                             |                            |            |  |                               |
| <u>8D</u>      | <u>B76</u>                          | <u>11I</u>                          | <u>UK</u>                   | <u>0</u>                   | <u>100</u> | <u>UK</u>                              | <u>UK</u>                     |
|                |                                     |                                     |                             |                            |            |  |                               |
|                |                                     |                                     |                             |                            |            |  |                               |
|                |                                     |                                     |                             |                            |            |  |                               |
|                |                                     |                                     |                             |                            |            |  |                               |
|                |                                     |                                     |                             |                            |            |  |                               |
|                |                                     |                                     |                             |                            |            |  |                               |
|                |                                     |                                     |                             |                            |            |  |                               |

<sup>1</sup>Use the codes provided in Exhibit 8-1 to designate the waste descriptions

<sup>2</sup>Use the codes provided in Exhibit 8-2 to designate the management methods

☐ Mark (X) this box if you attach a continuation sheet.

**EXHIBIT 8-1.**  
(Refers to question 8.06(b))

**WASTE DESCRIPTION CODES**

These waste description codes were developed specifically for this survey to supplement the descriptions listed with the RCRA and other waste codes. (These waste description codes are not regulatory definitions.)

**WASTE DESCRIPTION CODES FOR HAZARDOUS WASTE DESCRIBED BY A SINGLE RCRA F, K, P, OR U WASTE CODE**

|  |  |   |
|--|--|---|
| A01 Spent solvent (F001-F005, K086)        | A06 Contaminated soil or cleanup residue       | A10 Incinerator ash                                       |
| A02 Other organic liquid (F001-F005, K086) | A07 Other F or K waste, exactly as described*  | A11 Solidified treatment residue                          |
| A03 Still bottom (F001-F005, K086)         | A08 Concentrated off-spec or discarded product | A12 Other treatment residue (specify in "Facility Notes") |
| A04 Other organic sludge (F001-F005, K086) | A09 Empty containers                           | A13 Other untreated waste (specify in "Facility Notes")   |
| A05 Wastewater or aqueous mixture          |  |   |

\*"Exactly as described" means that the waste matches the description of the RCRA waste code.

**INORGANIC LIQUIDS**—Waste that is primarily inorganic and highly fluid (e.g., aqueous), with low suspended inorganic solids and low organic content.

- B01 Aqueous waste with low solvents
- B02 Aqueous waste with low other toxic organics
- B03 Spent acid with metals
- B04 Spent acid without metals
- B05 Acidic aqueous waste
- B06 Caustic solution with metals but no cyanides
- B07 Caustic solution with metals and cyanides
- B08 Caustic solution with cyanides but no metals
- B09 Spent caustic
- B10 Caustic aqueous waste
- B11 Aqueous waste with reactive sulfides
- B12 Aqueous waste with other reactives (e.g., explosives)
- B13 Other aqueous waste with high dissolved solids
- B14 Other aqueous waste with low dissolved solids
- B15 Scrubber water
- B16 Leachate
- B17 Waste liquid mercury
- B18 Other inorganic liquid (specify in "Facility Notes")

**INORGANIC SLUDGES**—Waste that is primarily inorganic, with moderate-to-high water content and low organic content; pumpable.

- B19 Lime sludge without metals
- B20 Lime sludge with metals/metal hydroxide sludge
- B21 Wastewater treatment sludge with toxic organics
- B22 Other wastewater treatment sludge
- B23 Untreated plating sludge without cyanides
- B24 Untreated plating sludge with cyanides
- B25 Other sludge with cyanides
- B26 Sludge with reactive sulfides
- B27 Sludge with other reactives
- B28 Degreasing sludge with metal scale or filings
- B29 Air pollution control device sludge (e.g., fly ash, wet scrubber sludge)
- B30 Sediment or lagoon dragout contaminated with organics
- B31 Sediment or lagoon dragout contaminated with inorganics only

- B32 Drilling mud
- B33 Asbestos slurry or sludge
- B34 Chloride or other brine sludge
- B35 Other inorganic sludge (specify in "Facility Notes")

**INORGANIC SOLIDS**—Waste that is primarily inorganic and solid, with low organic content and low-to-moderate water content; not pumpable.

- B36 Soil contaminated with organics
- B37 Soil contaminated with inorganics only
- B38 Ash, slag, or other residue from incineration of wastes
- B39 Other "dry" ash, slag, or thermal residue
- B40 "Dry" lime or metal hydroxide solids chemically "fixed"
- B41 "Dry" lime or metal hydroxide solids not "fixed"
- B42 Metal scale, filings, or scrap
- B43 Empty or crushed metal drums or containers
- B44 Batteries or battery parts, casings, cores
- B45 Spent solid filters or adsorbents
- B46 Asbestos solids and debris
- B47 Metal-cyanide salts/chemicals
- B48 Reactive cyanide salts/chemicals
- B49 Reactive sulfide salts/chemicals
- B50 Other reactive salts/chemicals
- B51 Other metal salts/chemicals
- B52 Other waste inorganic chemicals
- B53 Lab packs of old chemicals only
- B54 Lab packs of debris only
- B55 Mixed lab packs
- B56 Other inorganic solids (specify in "Facility Notes")

**INORGANIC GASES**—Waste that is primarily inorganic with a low organic content and is a gas at atmospheric pressure.

- B57 Inorganic gases

**ORGANIC LIQUIDS**—Waste that is primarily organic and is highly fluid, with low inorganic solids content and low-to-moderate water content.

- B58 Concentrated solvent-water solution
- B59 Halogenated (e.g., chlorinated) solvent
- B60 Nonhalogenated solvent

- B61 Halogenated/nonhalogenated solvent mixture
- B62 Oil-water emulsion or mixture
- B63 Waste oil
- B64 Concentrated aqueous solution of other organics
- B65 Concentrated phenolics
- B66 Organic paint, ink, lacquer, or varnish
- B67 Adhesives or epoxies
- B68 Paint thinner or petroleum distillates
- B69 Reactive or polymerizable organic liquid
- B70 Other organic liquid (specify in "Facility Notes")

**ORGANIC SLUDGES**—Waste that is primarily organic, with low-to-moderate inorganic solids content and water content; pumpable.

- B71 Still bottoms of halogenated (e.g., chlorinated) solvents or other organic liquids
- B72 Still bottoms of nonhalogenated solvents or other organic liquids
- B73 Oily sludge
- B74 Organic paint or ink sludge
- B75 Reactive or polymerizable organics
- B76 Resins, tars, or tarry sludge
- B77 Biological treatment sludge
- B78 Sewage or other untreated biological sludge
- B79 Other organic sludge (specify in "Facility Notes")

**ORGANIC SOLIDS**—Waste that is primarily organic and solid, with low-to-moderate inorganic content and water content; not pumpable.

- B80 Halogenated pesticide solid
- B81 Nonhalogenated pesticide solid
- B82 Solid resins or polymerized organics
- B83 Spent carbon
- B84 Reactive organic solid
- B85 Empty fiber or plastic containers
- B86 Lab packs of old chemicals only
- B87 Lab packs of debris only
- B88 Mixed lab packs
- B89 Other halogenated organic solid
- B90 Other nonhalogenated organic solid

**ORGANIC GASES**—Waste that is primarily organic with low-to-moderate inorganic content and is a gas at atmospheric pressure.

- B91 Organic gases



EXHIBIT 8-2.  
(Refers to question 8.06(c))

MANAGEMENT METHODS

- M1 = Discharge to publicly owned wastewater treatment works  
M2 = Discharge to surface water under NPDES  
M3 = Discharge to off-site, privately owned wastewater treatment works  
M4 = Scrubber: a) caustic; b) water; c) other  
M5 = Vent to: a) atmosphere; b) flare; c) other (specify) \_\_\_\_\_  
M6 = Other (specify) \_\_\_\_\_

TREATMENT AND RECYCLING

Incineration/thermal treatment

- 1I Liquid injection  
2I Rotary or rocking kiln  
3I Rotary kiln with a liquid injection unit  
4I Two stage  
5I Fixed hearth  
6I Multiple hearth  
7I Fluidized bed  
8I Infrared  
9I Fume/vapor  
10I Pyrolytic destructor  
11I Other incineration/thermal treatment

Reuse as fuel

- 1RF Cement kiln  
2RF Aggregate kiln  
3RF Asphalt kiln  
4RF Other kiln  
5RF Blast furnace  
6RF Sulfur recovery furnace  
7RF Smelting, melting, or refining furnace  
8RF Coke oven  
9RF Other industrial furnace  
10RF Industrial boiler  
11RF Utility boiler  
12RF Process heater  
13RF Other reuse as fuel unit

Fuel Blending

- 1FB Fuel blending

Solidification

- 1S Cement or cement/silicate processes  
2S Pozzolanic processes  
3S Asphaltic processes  
4S Thermoplastic techniques  
5S Organic polymer techniques  
6S Jacketing (macro-encapsulation)  
7S Other solidification

Recovery of solvents and liquid organics for reuse

- 1SR Fractionation  
2SR Batch still distillation  
3SR Solvent extraction  
4SR Thin-film evaporation  
5SR Filtration  
6SR Phase separation  
7SR Dessication  
8SR Other solvent recovery

Recovery of metals

- 1MR Activated carbon (for metals recovery)  
2MR Electrodialysis (for metals recovery)  
3MR Electrolytic metal recovery  
4MR Ion exchange (for metals recovery)  
5MR Reverse osmosis (for metals recovery)  
6MR Solvent extraction (for metals recovery)  
7MR Ultrafiltration (for metals recovery)  
8MR Other metals recovery

Wastewater Treatment

After each wastewater treatment type listed below (1WT - 66WT) specify a) tank; or b) surface impoundment (i.e., 63WTa)

Equalization

- 1WT Equalization

Cyanide oxidation

- 2WT Alkaline chlorination  
3WT Ozone  
4WT Electrochemical  
5WT Other cyanide oxidation

General oxidation (including disinfection)

- 6WT Chlorination  
7WT Ozonation  
8WT UV radiation  
9WT Other general oxidation

Chemical precipitation<sup>1</sup>

- 10WT Lime  
11WT Sodium hydroxide  
12WT Soda ash  
13WT Sulfide  
14WT Other chemical precipitation

Chromium reduction

- 15WT Sodium bisulfite  
16WT Sulfur dioxide

# EXHIBIT 8-2. (continued)

## MANAGEMENT METHODS

17WT Ferrous sulfate  
18WT Other chromium reduction

Complexed metals treatment (other than  
chemical precipitation by pH adjustment)  
19WT Complexed metals treatment

Emulsion breaking  
20WT Thermal  
21WT Chemical  
22WT Other emulsion breaking

Adsorption  
23WT Carbon adsorption  
24WT Ion exchange  
25WT Resin adsorption  
26WT Other adsorption

Stripping  
27WT Air stripping  
28WT Steam stripping  
29WT Other stripping

Evaporation  
30WT Thermal  
31WT Solar  
32WT Vapor recompression  
33WT Other evaporation

Filtration  
34WT Diatomaceous earth  
35WT Sand  
36WT Multimedia  
37WT Other filtration

Sludge dewatering  
38WT Gravity thickening  
39WT Vacuum filtration  
40WT Pressure filtration (belt, plate  
and frame, or leaf)  
41WT Centrifuge  
42WT Other sludge dewatering

Air flotation  
43WT Dissolved air flotation  
44WT Partial aeration  
45WT Air dispersion  
46WT Other air flotation

Oil skimming  
47WT Gravity separation

48WT Coalescing plate separation  
49WT Other oil skimming

Other liquid phase separation  
50WT Decanting  
51WT Other liquid phase separation

Biological treatment  
52WT Activated sludge  
53WT Fixed film-trickling filter  
54WT Fixed film-rotating contactor  
55WT Lagoon or basin, aerated  
56WT Lagoon, facultative  
57WT Anaerobic  
58WT Other biological treatment

Other wastewater treatment  
59WT Wet air oxidation  
60WT Neutralization  
61WT Nitrification  
62WT Denitrification  
63WT Flocculation and/or coagulation  
64WT Settling (clarification)  
65WT Reverse osmosis  
66WT Other wastewater treatment

## OTHER WASTE TREATMENT

1TR Other treatment  
2TR Other recovery for reuse

## ACCUMULATION

1A Containers  
2A Tanks

## STORAGE

1ST Container (i.e., barrel, drum)  
2ST Tank  
3ST Waste pile  
4ST Surface impoundment  
5ST Other storage

## DISPOSAL

1D Landfill  
2D Land treatment  
3D Surface impoundment (to be closed  
as a landfill)  
4D Underground injection well

<sup>1</sup>Chemical precipitation is a treatment operation whereby the pH of a waste is adjusted to the range necessary for removal (precipitation) of contaminants. However, if the pH is adjusted solely to achieve a neutral pH, THE OPERATION SHOULD BE CONSIDERED NEUTRALIZATION (60WT).

8.22 Describe the combustion chamber design parameters for each of the three largest (by capacity) incinerators that are used on-site to burn the residuals identified in your process block or residual treatment block flow diagram(s).

☐ *Response not required for TDI*

| Incinerator | Combustion Chamber Temperature (°C) |           | Location of Temperature Monitor |           | Residence Time In Combustion Chamber (seconds) |           |
|-------------|-------------------------------------|-----------|---------------------------------|-----------|--|-----------|
|             | Primary                             | Secondary | Primary                         | Secondary | Primary  | Secondary |
| 1           |                                     |           |                                 |           |  |           |
| 2           |                                     |           |                                 |           |  |           |
| 3           |                                     |           |                                 |           |  |           |

Indicate if Office of Solid Waste survey has been submitted in lieu of response by circling the appropriate response.

Yes ..... 1

No ..... 2

8.23 Complete the following table for the three largest (by capacity) incinerators that are used on-site to burn the residuals identified in your process block or residual treatment block flow diagram(s).

☐ *Not Applicable*

| Incinerator | Air Pollution Control Device <sup>1</sup> | Types of Emissions Data Available |
|-------------|---|-----------------------------------|
| 1           |   |                                   |
| 2           |   |                                   |
| 3           |   |                                   |

Indicate if Office of Solid Waste survey has been submitted in lieu of response by circling the appropriate response.

Yes ..... 1

No ..... 2

<sup>1</sup>Use the following codes to designate the air pollution control device:

S = Scrubber (include type of scrubber in parenthesis)  
 E = Electrostatic precipitator  
 O = Other (specify) \_\_\_\_\_

☐ Mark (X) this box if you attach a continuation sheet.

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## SECTION 9 WORKER EXPOSURE

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### General Instructions:

Questions 9.03-9.25 apply only to those processes and workers involved in manufacturing or processing the listed substance. Do not include workers involved in residual waste treatment unless they are involved in this treatment process on a regular basis (i.e., exclude maintenance workers, construction workers, etc.).

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☐ Mark (X) this box if you attach a continuation sheet.

---

PART A EMPLOYMENT AND POTENTIAL EXPOSURE PROFILE

9.01 Mark (X) the appropriate column to indicate whether your company maintains records on the following data elements for hourly and salaried workers. Specify for each data element the year in which you began maintaining records and the number of years the records for that data element are maintained. (Refer to the instructions for further explanation and an example.)

CBI

☐

| Data Element  | Data are Maintained for: |                     | Year in Which<br>Data Collection<br>Began | Number of<br>Years Records<br>Are Maintained |
|---|--------------------------|---------------------|---|--|
|   | Hourly<br>Workers        | Salaried<br>Workers |   |  |
| Date of hire  | <u>X</u>                 | <u>X</u>            | <u>1952</u>                               | <u>Indef</u>                                 |
| Age at hire   | <u>X</u>                 | <u>X</u>            | <u>1952</u>                               | <u>Indef</u>                                 |
| Work history of individual<br>before employment at your<br>facility | <u>X</u>                 | <u>X</u>            | <u>1952</u>                               | <u>Indef</u>                                 |
| Sex   | <u>X</u>                 | <u>X</u>            | <u>1952</u>                               | <u>Indef</u>                                 |
| Race  | <u>X</u>                 | <u>X</u>            | <u>1961</u>                               | <u>Indef</u>                                 |
| Job titles  | <u>X</u>                 | <u>X</u>            | <u>1952</u>                               | <u>Indef</u>                                 |
| Start date for each job<br>title                                    | <u>X</u>                 | <u>X</u>            | <u>1952</u>                               | <u>Indef</u>                                 |
| End date for each job title   | <u>X</u>                 | <u>X</u>            | <u>1952</u>                               | <u>Indef</u>                                 |
| Work area industrial hygiene<br>monitoring data                     | <u>X</u>                 | <u>X</u>            | <u>1980</u>                               | <u>Indef</u>                                 |
| Personal employee monitoring<br>data                                | <u>X</u>                 | <u>X</u>            | <u>1980</u>                               | <u>Indef</u>                                 |
| Employee medical history  | <u>X</u>                 | <u>X</u>            | <u>1952</u>                               | <u>Indef</u>                                 |
| Employee smoking history  | <u>NA</u>                | <u>NA</u>           | <u>NA</u>                                 | <u>NA</u>                                    |
| Accident history  | <u>X</u>                 | <u>X</u>            | <u>1952</u>                               | <u>Indef</u>                                 |
| Retirement date   | <u>X</u>                 | <u>X</u>            | <u>1952</u>                               | <u>Indef</u>                                 |
| Termination date  | <u>X</u>                 | <u>X</u>            | <u>1952</u>                               | <u>Indef</u>                                 |
| Vital status of retirees  | <u>X</u>                 | <u>X</u>            | <u>1952</u>                               | <u>Indef</u>                                 |
| Cause of death data   | <u>X</u>                 | <u>X</u>            | <u>1952</u>                               | <u>Indef</u>                                 |

☐ Mark (X) this box if you attach a continuation sheet.

9.02 In accordance with the instructions, complete the following table for each activity in which you engage.

CBI

☐

| a.                                  | b.                      | c.                          | d.                   | e.                        |
|-------------------------------------|-------------------------|-----------------------------|----------------------|---------------------------|
| <u>Activity</u>                     | <u>Process Category</u> | <u>Yearly Quantity (kg)</u> | <u>Total Workers</u> | <u>Total Worker-Hours</u> |
| Manufacture of the listed substance | Enclosed                | <u>Not App.</u>             | <u>Not App.</u>      | <u>Not App.</u>           |
|                                     | Controlled Release      | <u>"</u>                    | <u>"</u>             | <u>"</u>                  |
|                                     | Open                    | <u>"</u>                    | <u>"</u>             | <u>"</u>                  |
| On-site use as reactant             | Enclosed                | <u>"</u>                    | <u>"</u>             | <u>"</u>                  |
|                                     | Controlled Release      | <u>"</u>                    | <u>"</u>             | <u>"</u>                  |
|                                     | Open                    | <u>"</u>                    | <u>"</u>             | <u>"</u>                  |
| On-site use as nonreactant          | Enclosed                | <u>"</u>                    | <u>"</u>             | <u>"</u>                  |
|                                     | Controlled Release      | <u>"</u>                    | <u>"</u>             | <u>"</u>                  |
|                                     | Open                    | <u>"</u>                    | <u>"</u>             | <u>"</u>                  |
| On-site preparation of products     | Enclosed                | <u>"</u>                    | <u>"</u>             | <u>"</u>                  |
|                                     | Controlled Release      | <u>"</u>                    | <u>"</u>             | <u>"</u>                  |
|                                     | Open                    | <u>1.4 Kg</u>               | <u>N/A</u>           | <u>N/A</u>                |

☐ Mark (X) this box if you attach a continuation sheet.

9.03 Provide a descriptive job title for each labor category at your facility that encompasses workers who may potentially come in contact with or be exposed to the listed substance.

CBI

☐

Labor Category

Descriptive Job Title

A

Assembly Specialist

B

C

D

E

F

G

H

I

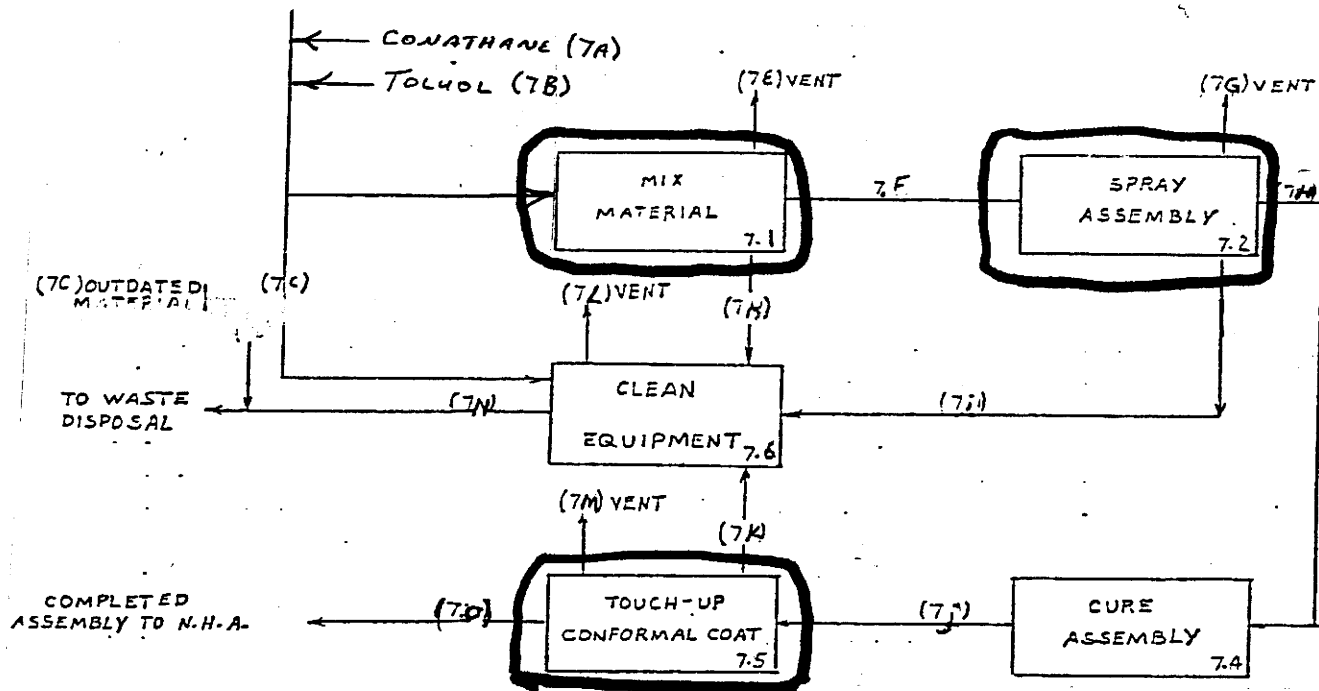
J

☐ Mark (X) this box if you attach a continuation sheet.

9.04 In accordance with the instructions, provide your process block flow diagram(s) and indicate associated work areas.

CBI

[ ] Process type ..... VACUUM IMPREGNATION OF TRANSFORMERS / CHOICES



☐ Mark (X) this box if you attach a continuation sheet.



9.05 Describe the various work area(s) shown in question 9.04 that encompass workers who may potentially come in contact with or be exposed to the listed substance. Add any additional areas not shown in the process block flow diagram in question 7.01 or 7.02. Photocopy this question and complete it separately for each process type.

CBI

☐ Process type ..... Vacuum Impregnation of Transformers

Work Area ID

Description of Work Areas and Worker Activities

|    |       |   |
|----|-------|---|
| 1  | (7.1) | (7.1) Ventilated Workbench - Operator   |
| 2  | (7.2) | mixes Part A / Part B in a 100/55 ratio |
| 3  | (7.5) | (by weight with a balance scale) in     |
| 4  |       | 46.5 gm. total batches                  |
| 5  |       | (7.2) Ventilated Workbench - operator   |
| 6  |       | sprays units with resin.                |
| 7  |       | (7.5) Ventilated Workbench - operator   |
| 8  |       | touches up units with resin.            |
| 9  |       |   |
| 10 |       |   |

☐ Mark (X) this box if you attach a continuation sheet.

9.06 Complete the following table for each work area identified in question 9.05, and for each labor category at your facility that encompasses workers who may potentially come in contact with or be exposed to the listed substance. Photocopy this question and complete it separately for each process type and work area.

☐ Process type ..... Vacuum Impregnation of Transformers

Work area ..... Coating

| Labor Category | Number of Workers Exposed | Mode of Exposure (e.g., direct skin contact) | Physical State of Listed Substance <sup>1</sup> | Average Length of Exposure Per Day <sup>2</sup> | Number of Days per Year Exposed |
|----------------|---------------------------|--|---|---|---------------------------------|
| <u>A</u>       | <u>1</u>                  | <u>Inhalation</u>                            | <u>OL</u>                                       | <u>C</u>  | <u>12</u>                       |
|                |                           |  |   |   |                                 |
|                |                           |  |   |   |                                 |
|                |                           |  |   |   |                                 |
|                |                           |  |   |   |                                 |
|                |                           |  |   |   |                                 |
|                |                           |  |   |   |                                 |
|                |                           |  |   |   |                                 |
|                |                           |  |   |   |                                 |
|                |                           |  |   |   |                                 |
|                |                           |  |   |   |                                 |

<sup>1</sup>Use the following codes to designate the physical state of the listed substance at the point of exposure:

GC = Gas (condensable at ambient temperature and pressure)

GU = Gas (uncondensable at ambient temperature and pressure; includes fumes, vapors, etc.)

SO = Solid

SY = Sludge or slurry

AL = Aqueous liquid

OL = Organic liquid

IL = Immiscible liquid (specify phases, e.g., 90% water, 10% toluene)

<sup>2</sup>Use the following codes to designate average length of exposure per day:

A = 15 minutes or less

B = Greater than 15 minutes, but not exceeding 1 hour

C = Greater than one hour, but not exceeding 2 hours

D = Greater than 2 hours, but not exceeding 4 hours

E = Greater than 4 hours, but not exceeding 8 hours

F = Greater than 8 hours

☐ Mark (X) this box if you attach a continuation sheet.

9.07 For each labor category represented in question 9.06, indicate the 8-hour Time Weighted Average (TWA) exposure levels and the 15-minute peak exposure levels. Photocopy this question and complete it separately for each process type and work area.

CBI

☐ Process type ..... Vacuum Impregnation of Transformers

Work area ..... Coating

| <u>Labor Category</u> | <u>8-hour TWA Exposure Level<br/>(ppm, mg/m<sup>3</sup>, other-specify)</u> | <u>15-Minute Peak Exposure Level<br/>(ppm, mg/m<sup>3</sup>, other-specify)</u> |
|-----------------------|---|---|
| <u>A</u>              | <u>NA</u>   | <u>NA</u>   |
|                       |   |   |
|                       |   |   |
|                       |   |   |
|                       |   |   |
|                       |   |   |
|                       |   |   |
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|                       |   |   |
|                       |   |   |
|                       |   |   |

☐ Mark (X) this box if you attach a continuation sheet.

PART B WORK PLACE MONITORING PROGRAM

9.08 If you monitor worker exposure to the listed substance, complete the following table.

CBI

☐

| Sample/Test             | Work Area ID     | Testing Frequency (per year) | Number of Samples (per test) | Who Samples <sup>1</sup> | Analyzed In-House (Y/N) | Number of Years Records Maintained |
|-------------------------|------------------|------------------------------|------------------------------|--------------------------|-------------------------|------------------------------------|
| Personal breathing zone | NA               | NA                           | NA                           | A                        | N                       | Indef                              |
| General work area (air) | NA               | NA                           | NA                           | A                        | N                       | Indef                              |
| Wipe samples            | NA <sub>pp</sub> | NA <sub>pp</sub>             | NA <sub>pp</sub>             | NA <sub>pp</sub>         | NA <sub>pp</sub>        | NA <sub>pp</sub>                   |
| Adhesive patches        | NA <sub>pp</sub> | NA <sub>pp</sub>             | NA <sub>pp</sub>             | NA <sub>pp</sub>         | NA <sub>pp</sub>        | NA <sub>pp</sub>                   |
| Blood samples           | NA <sub>pp</sub> | NA <sub>pp</sub>             | NA <sub>pp</sub>             | NA <sub>pp</sub>         | NA <sub>pp</sub>        | NA <sub>pp</sub>                   |
| Urine samples           | NA <sub>pp</sub> | NA <sub>pp</sub>             | NA <sub>pp</sub>             | NA <sub>pp</sub>         | NA <sub>pp</sub>        | NA <sub>pp</sub>                   |
| Respiratory samples     | NA <sub>pp</sub> | NA <sub>pp</sub>             | NA <sub>pp</sub>             | NA <sub>pp</sub>         | NA <sub>pp</sub>        | NA <sub>pp</sub>                   |
| Allergy tests           | NA <sub>pp</sub> | NA <sub>pp</sub>             | NA <sub>pp</sub>             | NA <sub>pp</sub>         | NA <sub>pp</sub>        | NA <sub>pp</sub>                   |
| Other (specify)         |                  |                              |                              |                          |                         |                                    |
|                         | NA <sub>pp</sub> | NA <sub>pp</sub>             | NA <sub>pp</sub>             | NA <sub>pp</sub>         | NA <sub>pp</sub>        | NA <sub>pp</sub>                   |
| Other (specify)         | NA <sub>pp</sub> | NA <sub>pp</sub>             | NA <sub>pp</sub>             | NA <sub>pp</sub>         | NA <sub>pp</sub>        | NA <sub>pp</sub>                   |
|                         |                  |                              |                              |                          |                         |                                    |
| Other (specify)         | NA <sub>pp</sub> | NA <sub>pp</sub>             | NA <sub>pp</sub>             | NA <sub>pp</sub>         | NA <sub>pp</sub>        | NA <sub>pp</sub>                   |
|                         |                  |                              |                              |                          |                         |                                    |

<sup>1</sup>Use the following codes to designate who takes the monitoring samples:

- A = Plant industrial hygienist
- B = Insurance carrier
- C = OSHA consultant
- D = Other (specify) \_\_\_\_\_

☐ Mark (X) this box if you attach a continuation sheet.

9.09 For each sample type identified in question 9.08, describe the type of sampling and analytical methodology used for each type of sample.

| <input type="checkbox"/> Sample Type | Sampling and Analytical Methodology |
|--------------------------------------|-------------------------------------|
| NA                                   | NA                                  |
|                                      |                                     |
|                                      |                                     |
|                                      |                                     |
|                                      |                                     |

9.10 If you conduct personal and/or ambient air monitoring for the listed substance, specify the following information for each equipment type used.

| <input type="checkbox"/> Equipment Type <sup>1</sup> | Detection Limit <sup>2</sup> | Manufacturer | Averaging Time (hr) | Model Number |
|--|------------------------------|--------------|---------------------|--------------|
| D  | 0.007A                       | Gilian       | < 7 hr.             | HFS 113A     |
|  |                              |              |                     |              |
|  |                              |              |                     |              |
|  |                              |              |                     |              |
|  |                              |              |                     |              |

<sup>1</sup>Use the following codes to designate personal air monitoring equipment types:

- A = Passive dosimeter
- B = Detector tube
- C = Charcoal filtration tube with pump
- D = Other (specify) NIOSH 141

Use the following codes to designate ambient air monitoring equipment types:

- E = Stationary monitors located within work area
- F = Stationary monitors located within facility
- G = Stationary monitors located at plant boundary
- H = Mobile monitoring equipment (specify) \_\_\_\_\_
- I = Other (specify) \_\_\_\_\_

<sup>2</sup>Use the following codes to designate detection limit units:

- A = ppm
- B = Fibers/cubic centimeter (f/cc)
- C = Micrograms/cubic meter ( $\mu/m^3$ )

☐ Mark (X) this box if you attach a continuation sheet.

9.11 If you conduct routine medical tests for monitoring the health effects of exposure to the listed substance, specify the type and frequency of the tests.

CBI

☐

Test Description

Frequency  
(weekly, monthly, yearly, etc.)

Not Applicable

Not Applicable

☐ Mark (X) this box if you attach a continuation sheet.

PART C ENGINEERING CONTROLS

9.12 Describe the engineering controls that you use to reduce or eliminate worker exposure to the listed substance. Photocopy this question and complete it separately for each process type and work area.

CBI

☐ Process type ..... Vacuum Impregnation of Transformers

Work area ..... Coating

| <u>Engineering Controls</u>                  | <u>Used<br/>(Y/N)</u> | <u>Year<br/>Installed</u> | <u>Upgraded<br/>(Y/N)</u> | <u>Year<br/>Upgraded</u> |
|--|-----------------------|---------------------------|---------------------------|--------------------------|
| Ventilation:                                 |                       |                           |                           |                          |
| Local exhaust                                | <u>Y</u>              | <u>UK</u>                 | <u>UK</u>                 | <u>UK</u>                |
| General dilution                             | <u>Not App.</u>       | <u>Not App.</u>           | <u>Not App.</u>           | <u>Not App.</u>          |
| Other (specify)<br>_____                     | <u>NA</u>             | <u>NA</u>                 | <u>NA</u>                 | <u>NA</u>                |
| Vessel emission controls                     | <u>NA</u>             | <u>NA</u>                 | <u>NA</u>                 | <u>NA</u>                |
| Mechanical loading or<br>packaging equipment | <u>NA</u>             | <u>NA</u>                 | <u>NA</u>                 | <u>NA</u>                |
| Other (specify)<br>_____                     | <u>NA</u>             | <u>NA</u>                 | <u>NA</u>                 | <u>NA</u>                |

☐ Mark (X) this box if you attach a continuation sheet.

9.13 Describe all equipment or process modifications you have made within the 3 years prior to the reporting year that have resulted in a reduction of worker exposure to the listed substance. For each equipment or process modification described, state the percentage reduction in exposure that resulted. Photocopy this question and complete it separately for each process type and work area.

CBI

☐ Process type ..... Vacuum Impregnation of Transformers

Work area ..... Coating

| Equipment or Process Modification | Reduction in Worker Exposure Per Year (%) |
|-----------------------------------|---|
| NA                                | NA  |
|                                   |   |
|                                   |   |
|                                   |   |
|                                   |   |

☐ Mark (X) this box if you attach a continuation sheet.



PART D PERSONAL PROTECTIVE AND SAFETY EQUIPMENT

- 9.14 Describe the personal protective and safety equipment that your workers wear or use in each work area in order to reduce or eliminate their exposure to the listed substance. Photocopy this question and complete it separately for each process type and work area.

CBI

☐ Process type ..... Vacuum Impregnation of Transformers  
Work area ..... Coating

| <u>Equipment Types</u>    | <u>Wear or Use (Y/N)</u> |
|---------------------------|--------------------------|
| Respirators               | <u>N</u>                 |
| Safety goggles/glasses    | <u>Y</u>                 |
| Face shields              | <u>N</u>                 |
| Coveralls                 | <u>N</u>                 |
| Bib aprons                | <u>N</u>                 |
| Chemical-resistant gloves | <u>Y</u>                 |
| Other (specify)           |                          |
| _____                     | NA                       |
| _____                     | NA                       |

☐ Mark (X) this box if you attach a continuation sheet.

9.15 If workers use respirators when working with the listed substance, specify for each process type, the work areas where the respirators are used, the type of respirators used, the average usage, whether or not the respirators were fit tested, and the type and frequency of the fit tests. Photocopy this question and complete it separately for each process type.

CBI

*Not Applicable*

☐ Process type .....

| <u>Work Area</u> | <u>Respirator Type</u> | <u>Average Usage<sup>1</sup></u> | <u>Fit Tested (Y/N)</u> | <u>Type of Fit Test<sup>2</sup></u> | <u>Frequency of Fit Tests (per year)</u> |
|------------------|------------------------|----------------------------------|-------------------------|-------------------------------------|--|
| _____            | _____                  | _____                            | _____                   | _____                               | _____                                    |
| _____            | _____                  | _____                            | _____                   | _____                               | _____                                    |
| _____            | _____                  | _____                            | _____                   | _____                               | _____                                    |
| _____            | _____                  | _____                            | _____                   | _____                               | _____                                    |

<sup>1</sup>Use the following codes to designate average usage:

A = Daily

B = Weekly

C = Monthly

D = Once a year

E = Other (specify) \_\_\_\_\_

<sup>2</sup>Use the following codes to designate the type of fit test:

QL = Qualitative

QT = Quantitative

☐ Mark (X) this box if you attach a continuation sheet.

PART E WORK PRACTICES

- 9.19 Describe all of the work practices and administrative controls used to reduce or eliminate worker exposure to the listed substance (e.g., restrict entrance only to authorized workers, mark areas with warning signs, insure worker detection and monitoring practices, provide worker training programs, etc.). Photocopy this question and complete it separately for each process type and work area.

CBI

☐

Process type ..... Vacuum Impregnation of Transformers

Work area ..... Coating

All employees are trained in the use  
of chemicals as part of our compliance  
with OSHA 1910.1200.

- 9.20 Indicate (X) how often you perform each housekeeping task used to clean up routine leaks or spills of the listed substance. Photocopy this question and complete it separately for each process type and work area.

Process type ..... Vacuum Impregnation of Transformers

Work area ..... Coating

| <u>Housekeeping Tasks</u> | <u>Less Than<br/>Once Per Day</u> | <u>1-2 Times<br/>Per Day</u> | <u>3-4 Times<br/>Per Day</u> | <u>More Than 4<br/>Times Per Day</u> |
|---------------------------|-----------------------------------|------------------------------|------------------------------|--------------------------------------|
| Sweeping                  | _____                             | <u>X</u>                     | _____                        | _____                                |
| Vacuuming                 | _____                             | _____                        | _____                        | _____                                |
| Water flushing of floors  | <u>X</u>                          | _____                        | _____                        | _____                                |
| Other (specify)           | _____                             | _____                        | _____                        | _____                                |

☐

Mark (X) this box if you attach a continuation sheet.

9.21 Do you have a written medical action plan for responding to routine or emergency exposure to the listed substance?

Routine exposure

*Response Not Required for TDI*

Yes ..... 1

No ..... 2

Emergency exposure

Yes ..... 1

No ..... 2

If yes, where are copies of the plan maintained?

Routine exposure: \_\_\_\_\_

Emergency exposure: \_\_\_\_\_

9.22 Do you have a written leak and spill cleanup plan that addresses the listed substance? Circle the appropriate response.

☒ Yes ..... 1

No ..... 2

If yes, where are copies of the plan maintained? *Environmental Affairs Office*

Has this plan been coordinated with state or local government response organizations?  
Circle the appropriate response.

Yes ..... 1

☒ No ..... 2

9.23 Who is responsible for monitoring worker safety at your facility? Circle the appropriate response.

*Response Not Required for TDI*

Plant safety specialist ..... 1

Insurance carrier ..... 2

OSHA consultant ..... 3

Other (specify) \_\_\_\_\_ ..... 4

☐ Mark (X) this box if you attach a continuation sheet.

## SECTION 10 ENVIRONMENTAL RELEASE

### General Instructions:

Complete Part E (questions 10.23-10.35) for each non-routine release involving the listed substance that occurred during the reporting year. Report on all releases that are equal to or greater than the listed substance's reportable quantity value, RQ, unless the release is federally permitted as defined in 42 U.S.C. 9601, or is specifically excluded under the definition of release as defined in 40 CFR 302.3(22). Reportable quantities are codified in 40 CFR Part 302. If the listed substance is not a hazardous substance under the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA) and, thus, does not have an RQ, then report releases that exceed 2,270 kg. If such a substance however, is designated as a CERCLA hazardous substance, then report those releases that are equal to or greater than the RQ. The facility may have answered these questions or similar questions under the Agency's Accidental Release Information Program and may already have this information readily available. Assign a number to each release and use this number throughout this part to identify the release. Releases over more than a 24-hour period are not single releases, i.e., the release of a chemical substance equal to or greater than an RQ must be reported as a separate release for each 24-hour period the release exceeds the RQ.

For questions 10.25-10.35, answer the questions for each release identified in question 10.23. Photocopy these questions and complete them separately for each release.

### PART A GENERAL INFORMATION

10.01 Where is your facility located? Circle all appropriate responses.

CBI

- ☐ Industrial area ..... 1
- ☒ Urban area ..... 2
- Residential area ..... 3
- Agricultural area ..... 4
- Rural area ..... 5
- Adjacent to a park or a recreational area ..... 6
- ☒ Within 1 mile of a navigable waterway ..... 7
- ☒ Within 1 mile of a school, university, hospital, or nursing home facility ..... 8
- Within 1 mile of a non-navigable waterway ..... 9
- Other (specify) \_\_\_\_\_ ..... 10
- (Presentation of Mary Academy)*

☐ Mark (X) this box if you attach a continuation sheet.

- 10.02 Specify the exact location of your facility (from central point where process unit is located) in terms of latitude and longitude or Universal Transverse Mercader (UTM) coordinates.

Latitude ..... 42° 44' 51"

Longitude ..... 71° 25' 30"

UTM coordinates ..... Zone \_\_\_\_\_, Northing \_\_\_\_\_, Easting \_\_\_\_\_

- 10.03 If you monitor meteorological conditions in the vicinity of your facility, provide the following information.

Average annual precipitation ..... UK inches/year

Predominant wind direction ..... UK

- 10.04 Indicate the depth to groundwater below your facility.

Depth to groundwater ..... UK meters

- 10.05 For each on-site activity listed, indicate (Y/N/NA) all routine releases of the listed substance to the environment. (Refer to the instructions for a definition of CBI Y, N, and NA.)

☐

| On-Site Activity            | Environmental Release |           |           |
|-----------------------------|-----------------------|-----------|-----------|
|                             | Air                   | Water     | Land      |
| Manufacturing               | <u>NA</u>             | <u>NA</u> | <u>NA</u> |
| Importing                   | <u>NA</u>             | <u>NA</u> | <u>NA</u> |
| Processing                  | <u>Y</u>              | <u>N</u>  | <u>N</u>  |
| Otherwise used              | <u>NA</u>             | <u>NA</u> | <u>NA</u> |
| Product or residual storage | <u>NA</u>             | <u>NA</u> | <u>NA</u> |
| Disposal                    | <u>NA</u>             | <u>NA</u> | <u>NA</u> |
| Transport                   | <u>NA</u>             | <u>NA</u> | <u>NA</u> |

☐ Mark (X) this box if you attach a continuation sheet.

10.06 Provide the following information for the listed substance and specify the level of precision for each item. (Refer to the instructions for further explanation and an example.)

CBI

☐

Quantity discharged to the air ..... UK kg/yr ± - %

Quantity discharged in wastewaters ..... Not Applicable kg/yr ± - %

Quantity managed as other waste in on-site treatment, storage, or disposal units ..... NA kg/yr ± - %

Quantity managed as other waste in off-site treatment, storage, or disposal units ..... UK kg/yr ± - %

☐ Mark (X) this box if you attach a continuation sheet.

10.08 Describe the control technologies used to minimize release of the listed substance for each process stream containing the listed substance as identified in your process block or residual treatment block flow diagram(s). Photocopy this question and complete it separately for each process type.

CBI

☐ Process type ..... Vacuum Impregnation of Transformers

| <u>Stream ID Code</u> | <u>Control Technology</u> | <u>Percent Efficiency</u> |
|-----------------------|---------------------------|---------------------------|
| <u>7E</u>             | <u>None</u>               | <u>NA</u>                 |
| <u>7G</u>             | <u>None</u>               | <u>NA</u>                 |
| <u>7L</u>             | <u>None</u>               | <u>NA</u>                 |
| <u>7M</u>             | <u>None</u>               | <u>NA</u>                 |
|                       |                           |                           |
|                       |                           |                           |
|                       |                           |                           |
|                       |                           |                           |
|                       |                           |                           |
|                       |                           |                           |
|                       |                           |                           |
|                       |                           |                           |

☐ Mark (X) this box if you attach a continuation sheet.



PART B RELEASE TO AIR

- 10.09 Point Source Emissions -- Identify each emission point source containing the listed substance in terms of a Stream ID Code as identified in your process block or residual treatment block flow diagram(s), and provide a description of each point source. Do not include raw material and product storage vents, or fugitive emission sources (e.g., equipment leaks). Photocopy this question and complete it separately for each process type.

Process type ..... Vacuum Impregnation of Transformers

Point Source  
ID Code

Description of Emission Point Source

7E

Material Mix Station Vent

7G

Spray Assembly Vent

7L

Equipment Cleaning Vent

7M

Touch-Up Station Vent

☐ Mark (X) this box if you attach a continuation sheet.

☐ Mark (X) this box if you attach a continuation sheet.

10.10 Emission Characteristics -- Characterize the emissions for each Point Source ID Code identified in question 10.09 by completing the following table.

CBI

☐

| Point<br>Source<br>ID<br>Code | Physical<br>State <sup>1</sup> | Average<br>Emissions<br>(kg/day) | Frequency <sup>2</sup><br>(days/yr) | Duration <sup>3</sup><br>(min/day) | Average<br>Emission<br>Factor <sup>4</sup> | Maximum<br>Emission<br>Rate<br>(kg/min) | Maximum<br>Emission<br>Rate<br>Frequency<br>(events/yr) | Maximum<br>Emission<br>Rate<br>Duration<br>(min/event) |
|-------------------------------|--------------------------------|----------------------------------|-------------------------------------|------------------------------------|--|---|---|--|
| 7E                            | G                              | UK                               | UK                                  | UK                                 | UK   | UK                                      | UK  | UK   |
| 7G                            | G                              | UK                               | UK                                  | UK                                 | UK   | UK                                      | UK  | UK   |
| 7L                            | G                              | UK                               | UK                                  | UK                                 | UK   | UK                                      | UK  | UK   |
| 7M                            | G                              | UK                               | UK                                  | UK                                 | UK   | UK                                      | UK  | UK   |
|                               |                                |                                  |                                     |                                    |  |   |   |  |
|                               |                                |                                  |                                     |                                    |  |   |   |  |
|                               |                                |                                  |                                     |                                    |  |   |   |  |
|                               |                                |                                  |                                     |                                    |  |   |   |  |
|                               |                                |                                  |                                     |                                    |  |   |   |  |
|                               |                                |                                  |                                     |                                    |  |   |   |  |

<sup>1</sup>Use the following codes to designate physical state at the point of release:

G = Gas; V = Vapor; P = Particulate; A = Aerosol; O = Other (specify) \_\_\_\_\_

<sup>2</sup>Frequency of emission at any level of emission

<sup>3</sup>Duration of emission at any level of emission

<sup>4</sup>Average Emission Factor -- Provide estimated ( $\pm$  25 percent) emission factor (kg of emission per kg of production of listed substance)

10.11 Stack Parameters -- Identify the stack parameters for each Point Source ID Code identified in question 10.09 by completing the following table.

CBI

☐

| Point<br>Source<br>ID<br>Code | Stack<br>Height(m) | Stack<br>Inner<br>Diameter<br>(at outlet)<br>(m) | Exhaust<br>Temperature<br>(°C) | Emission<br>Exit<br>Velocity<br>(m/sec) | Building<br>Height(m) <sup>1</sup> | Building<br>Width(m) <sup>2</sup> | Vent,<br>Type <sup>3</sup> |
|-------------------------------|--------------------|--|--------------------------------|---|------------------------------------|-----------------------------------|----------------------------|
| 7E                            | 5.5 m              | 0.2 m  | UK                             | UK                                      | 7.3 m                              | 133.8 m                           | V                          |
| 7G                            | 5.5 m              | 0.2 m  | UK                             | UK                                      | 7.3 m                              | 133.8 m                           | V                          |
| 7L                            | 5.5 m              | 0.2 m  | UK                             | UK                                      | 7.3 m                              | 133.8 m                           | V                          |
| 7M                            | 5.5 m              | 0.2 m  | UK                             | UK                                      | 7.3 m                              | 133.8 m                           | V                          |
|                               |                    |  |                                |   |                                    |                                   |                            |
|                               |                    |  |                                |   |                                    |                                   |                            |
|                               |                    |  |                                |   |                                    |                                   |                            |
|                               |                    |  |                                |   |                                    |                                   |                            |
|                               |                    |  |                                |   |                                    |                                   |                            |
|                               |                    |  |                                |   |                                    |                                   |                            |
|                               |                    |  |                                |   |                                    |                                   |                            |
|                               |                    |  |                                |   |                                    |                                   |                            |

<sup>1</sup>Height of attached or adjacent building

<sup>2</sup>Width of attached or adjacent building

<sup>3</sup>Use the following codes to designate vent type:

H = Horizontal

V = Vertical

☐ Mark (X) this box if you attach a continuation sheet.

10.12 If the listed substance is emitted in particulate form, indicate the particle size distribution for each Point Source ID Code identified in question 10.09. Photocopy this question and complete it separately for each emission point source.

CBI

☐

*Not Applicable*

Point source ID code .....

Size Range (microns)

Mass Fraction (% ± % precision)

< 1

≥ 1 to < 10

≥ 10 to < 30

≥ 30 to < 50

≥ 50 to < 100

≥ 100 to < 500

≥ 500

Total = 100%

☐ Mark (X) this box if you attach a continuation sheet.

10.13 Equipment Leaks -- Complete the following table by providing the number of equipment types listed which are exposed to the listed substance and which are in service according to the specified weight percent of the listed substance passing through the component. Do this for each process type identified in your process block or residual treatment block flow diagram(s). Do not include equipment types that are not exposed to the listed substance. If this is a batch or intermittently operated process, give an overall percentage of time per year that the process type is exposed to the listed substance. Photocopy this question and complete it separately for each process type.

☐ Process type ..... Not Applicable - any leak prevents process from working  
Percentage of time per year that the listed substance is exposed to this process type .....

| Equipment Type  | Number of Components in Service by Weight Percent<br>of Listed Substance in Process Stream |       |        |        |        |                     |
|---|--|-------|--------|--------|--------|---------------------|
|   | Less<br>than 5%  | 5-10% | 11-25% | 26-75% | 76-99% | Greater<br>than 99% |
| Pump seals <sup>1</sup>                                     |  |       |        |        |        |                     |
| Packed  |  |       |        |        |        |                     |
| Mechanical  |  |       |        |        |        |                     |
| Double mechanical <sup>2</sup>                              |  |       |        |        |        |                     |
| Compressor seals <sup>1</sup>                               |  |       |        |        |        |                     |
| Flanges   |  |       |        |        |        |                     |
| Valves  |  |       |        |        |        |                     |
| Gas <sup>3</sup>  |  |       |        |        |        |                     |
| Liquid  |  |       |        |        |        |                     |
| Pressure relief devices <sup>4</sup><br>(Gas or vapor only) |  |       |        |        |        |                     |
| Sample connections  |  |       |        |        |        |                     |
| Gas   |  |       |        |        |        |                     |
| Liquid  |  |       |        |        |        |                     |
| Open-ended lines <sup>5</sup><br>(e.g., purge, vent)        |  |       |        |        |        |                     |
| Gas   |  |       |        |        |        |                     |
| Liquid  |  |       |        |        |        |                     |

<sup>1</sup>List the number of pump and compressor seals, rather than the number of pumps or compressors

10.13 continued on next page

☐ Mark (X) this box if you attach a continuation sheet.

10.13 (continued)

<sup>2</sup>If double mechanical seals are operated with the barrier (B) fluid at a pressure greater than the pump stuffing box pressure and/or equipped with a sensor (S) that will detect failure of the seal system, the barrier fluid system, or both, indicate with a "B" and/or an "S", respectively

<sup>3</sup>Conditions existing in the valve during normal operation

<sup>4</sup>Report all pressure relief devices in service, including those equipped with control devices

<sup>5</sup>Lines closed during normal operation that would be used during maintenance operations

10.14 Pressure Relief Devices with Controls -- Complete the following table for those pressure relief devices identified in 10.13 to indicate which pressure relief devices in service are controlled. If a pressure relief device is not controlled, enter "None" under column c.

CBI

☐

*Not Applicable*

| a.<br>Number of<br>Pressure Relief Devices | b.<br>Percent Chemical<br>in Vessel <sup>1</sup> | c.<br>Control Device | d.<br>Estimated<br>Control Efficiency <sup>2</sup> |
|--|--|----------------------|--|
| _____                                      | _____  | _____                | _____  |
| _____                                      | _____  | _____                | _____  |
| _____                                      | _____  | _____                | _____  |
| _____                                      | _____  | _____                | _____  |
| _____                                      | _____  | _____                | _____  |
| _____                                      | _____  | _____                | _____  |
| _____                                      | _____  | _____                | _____  |
| _____                                      | _____  | _____                | _____  |
| _____                                      | _____  | _____                | _____  |

<sup>1</sup>Refer to the table in question 10.13 and record the percent range given under the heading entitled "Number of Components in Service by Weight Percent of Listed Substance" (e.g., <5%, 5-10%, 11-25%, etc.)

<sup>2</sup>The EPA assigns a control efficiency of 100 percent for equipment leaks controlled with rupture discs under normal operating conditions. The EPA assigns a control efficiency of 98 percent for emissions routed to a flare under normal operating conditions

☐ Mark (X) this box if you attach a continuation sheet.

10.15 Equipment Leak Detection -- If a formal leak detection and repair program is in place, complete the following table regarding those leak detection and repair procedures. Photocopy this question and complete it separately for each process type.

CBI

*Not Applicable*

☐ Process type .....

| Equipment Type                              | Leak Detection   | Detection Device <sup>1</sup> | Frequency of Leak Detection (per year) | Repairs Initiated (days after detection) | Repairs Completed (days after initiated) |
|---|--|-------------------------------|--|--|--|
|   | Concentration (ppm or mg/m <sup>3</sup> ) Measured at _____ Inches from Source |                               |  |  |  |
| Pump seals                                  |  |                               |  |  |  |
| Packed                                      | _____  | _____                         | _____                                  | _____                                    | _____                                    |
| Mechanical                                  | _____  | _____                         | _____                                  | _____                                    | _____                                    |
| Double mechanical                           | _____  | _____                         | _____                                  | _____                                    | _____                                    |
| Compressor seals                            | _____  | _____                         | _____                                  | _____                                    | _____                                    |
| Flanges                                     | _____  | _____                         | _____                                  | _____                                    | _____                                    |
| Valves                                      |  |                               |  |  |  |
| Gas   | _____  | _____                         | _____                                  | _____                                    | _____                                    |
| Liquid                                      | _____  | _____                         | _____                                  | _____                                    | _____                                    |
| Pressure relief devices (gas or vapor only) | _____  | _____                         | _____                                  | _____                                    | _____                                    |
| Sample connections                          |  |                               |  |  |  |
| Gas   | _____  | _____                         | _____                                  | _____                                    | _____                                    |
| Liquid                                      | _____  | _____                         | _____                                  | _____                                    | _____                                    |
| Open-ended lines                            |  |                               |  |  |  |
| Gas   | _____  | _____                         | _____                                  | _____                                    | _____                                    |
| Liquid                                      | _____  | _____                         | _____                                  | _____                                    | _____                                    |

<sup>1</sup>Use the following codes to designate detection device:

POVA = Portable organic vapor analyzer

FPM = Fixed point monitoring

0 = Other (specify) \_\_\_\_\_

☐ Mark (X) this box if you attach a continuation sheet.

☐ Mark (X) this box if you attach a continuation sheet.

- 10.16 Raw Material, Intermediate and Product Storage Emissions -- Complete the following table by providing the information on each liquid raw material, intermediate, and product storage vessel containing the listed substance as identified in your process block or residual treatment block flow diagram(s).

CBI



*Not Applicable*

| Vessel Type <sup>1</sup> | Floating Roof <sup>2</sup> Seals | Composition of Stored Materials <sup>3</sup> | Throughput (liters per year) | Vessel Filling Rate (gpm) | Vessel Filling Duration (min) | Vessel Inner Diameter (m) | Vessel Height (m) | Vessel Volume (l) | Vessel Emission Controls <sup>4</sup> | Design Flow Rate <sup>5</sup> | Vent Diameter (cm) | Control Efficiency (%) | Basis for Estimate <sup>6</sup> |
|--------------------------|----------------------------------|--|------------------------------|---------------------------|-------------------------------|---------------------------|-------------------|-------------------|---------------------------------------|-------------------------------|--------------------|------------------------|---------------------------------|
|                          |                                  |  |                              |                           |                               |                           |                   |                   |                                       |                               |                    |                        |                                 |
|                          |                                  |  |                              |                           |                               |                           |                   |                   |                                       |                               |                    |                        |                                 |
|                          |                                  |  |                              |                           |                               |                           |                   |                   |                                       |                               |                    |                        |                                 |
|                          |                                  |  |                              |                           |                               |                           |                   |                   |                                       |                               |                    |                        |                                 |
|                          |                                  |  |                              |                           |                               |                           |                   |                   |                                       |                               |                    |                        |                                 |
|                          |                                  |  |                              |                           |                               |                           |                   |                   |                                       |                               |                    |                        |                                 |
|                          |                                  |  |                              |                           |                               |                           |                   |                   |                                       |                               |                    |                        |                                 |
|                          |                                  |  |                              |                           |                               |                           |                   |                   |                                       |                               |                    |                        |                                 |

<sup>1</sup>Use the following codes to designate vessel type:

F = Fixed roof  
 CIF = Contact internal floating roof  
 NCIF = Noncontact internal floating roof  
 EFR = External floating roof  
 P = Pressure vessel (indicate pressure rating)  
 H = Horizontal  
 U = Underground

<sup>2</sup>Use the following codes to designate floating roof seals:

MS1 = Mechanical shoe, primary  
 MS2 = Shoe-mounted secondary  
 MS2R = Rim-mounted, secondary  
 LM1 = Liquid-mounted resilient filled seal, primary  
 LM2 = Rim-mounted shield  
 LMW = Weather shield  
 VM1 = Vapor mounted resilient filled seal, primary  
 VM2 = Rim-mounted secondary  
 VMW = Weather shield

<sup>3</sup>Indicate weight percent of the listed substance. Include the total volatile organic content in parenthesis

<sup>4</sup>Other than floating roofs

<sup>5</sup>Gas/vapor flow rate the emission control device was designed to handle (specify flow rate units)

<sup>6</sup>Use the following codes to designate basis for estimate of control efficiency:

C = Calculations  
 S = Sampling



## PART E NON-ROUTINE RELEASES

*Not Applicable*

- 10.23 Indicate the date and time when the release occurred and when the release ceased or was stopped. If there were more than six releases, attach a continuation sheet and list all releases.

| <u>Release</u> | <u>Date Started</u>         | <u>Time (am/pm)</u>         | <u>Date Stopped</u>         | <u>Time (am/pm)</u>         |
|----------------|-----------------------------|-----------------------------|-----------------------------|-----------------------------|
| <u>1</u>       | <u>                    </u> | <u>                    </u> | <u>                    </u> | <u>                    </u> |
| <u>2</u>       | <u>                    </u> | <u>                    </u> | <u>                    </u> | <u>                    </u> |
| <u>3</u>       | <u>                    </u> | <u>                    </u> | <u>                    </u> | <u>                    </u> |
| <u>4</u>       | <u>                    </u> | <u>                    </u> | <u>                    </u> | <u>                    </u> |
| <u>5</u>       | <u>                    </u> | <u>                    </u> | <u>                    </u> | <u>                    </u> |
| <u>6</u>       | <u>                    </u> | <u>                    </u> | <u>                    </u> | <u>                    </u> |

- 10.24 Specify the weather conditions at the time of each release.

*Response Not Required for TOI*

| <u>Release</u> | <u>Wind Speed (km/hr)</u>   | <u>Wind Direction</u>       | <u>Humidity (%)</u>         | <u>Temperature (°C)</u>     | <u>Precipitation (Y/N)</u>  |
|----------------|-----------------------------|-----------------------------|-----------------------------|-----------------------------|-----------------------------|
| <u>1</u>       | <u>                    </u> | <u>                    </u> | <u>                    </u> | <u>                    </u> | <u>                    </u> |
| <u>2</u>       | <u>                    </u> | <u>                    </u> | <u>                    </u> | <u>                    </u> | <u>                    </u> |
| <u>3</u>       | <u>                    </u> | <u>                    </u> | <u>                    </u> | <u>                    </u> | <u>                    </u> |
| <u>4</u>       | <u>                    </u> | <u>                    </u> | <u>                    </u> | <u>                    </u> | <u>                    </u> |
| <u>5</u>       | <u>                    </u> | <u>                    </u> | <u>                    </u> | <u>                    </u> | <u>                    </u> |
| <u>6</u>       | <u>                    </u> | <u>                    </u> | <u>                    </u> | <u>                    </u> | <u>                    </u> |

☐ Mark (X) this box if you attach a continuation sheet.